

# EXHIBIT O



LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT  
PALMDALE STATION - 95812

**Request for Information**

Date of Request: 12-19-19

Driver Lic / ID #: P0258209

Expiration Date: 2-5-20

Name: Carol Watson

Address: 4461 Rose Dr

Yorba Linda CA 92886

Date of Incident: 6-14-18

URN / File#: 918-68710-2646-151

- ☐ TRAFFIC COLLISION REPORT \$25
- ☐ CRIME REPORT \$25
- ☐ TRAVEL CLEARANCE \$31
- ☐ EXTENDED RECORD SEARCH \$22.50  
(charge only for 2nd hour of labor)

**TOWED VEHICLE ADMIN FEE**

- ☐ Los Angeles County \$93
- ☐ City of Palmdale \$93
- ☐ REPOSSESSION \$15
- ☐ CITATION CORRECTION \$20

Issuing Agency: \_\_\_\_\_

Citation Number: \_\_\_\_\_

License Plate: \_\_\_\_\_

☒ FIREARM RELEASE  
No. of firearms 451 x \$54

- ☐ RESTITUTION \$
- ☐ TRUST FUND \$
- ☐ WITNESS FEE (see note below) \$275

Do not accept if court date is less than 5 business days away.  
Attach copy of subpoena to this form. Place original with  
additional copy in Detective Bureau's mailbox.

☐ MISCELLANEOUS \$  
Describe: \_\_\_\_\_

**For Department Use Only**

Received by: [Signature]

☐ Cash ☐ Credit ☐ Check Number: 6303

**DEFENDANTS**

>>SALES

STATION:Palmdale

POS#:1

DATE: 12/19/2019 2:55 PM

TICKET#: 260100000295

ORDER DATE: 12/19/2019 2:54:53 PM

Item Description	Qty	Price
100 Firearm Release	451	54.00

Subtotal: 24354.00  
\*Tax (9.500%): 0.00  
Total Amount: 24354.00

[Tender Type] [Amount]  
Check: 24354.00

Paid Amount: 24354.00

PAID

05270

**EXHIBIT O**  
**000651**

#12764

<b>CAROL WATSON'S ORANGE COAST AUCTIONS</b> 1501 N RAYMOND AVE B ANAHEIM, CA 92801-1100		6303 90-119/1222
DATE <u>12-19-19</u>		CHECK ARMOR
PAY TO THE ORDER OF <u>LOS ANGELES COUNTY SHERIFF'S DEPARTMENT</u> \$ <u>24,354.00</u> <u>KX</u> <u>Twenty-four thousand three hundred fifty-four &amp; no/100</u> DOLLARS	Photo Safe Deposit Details on back	
<b>F&amp;M Farmers &amp; Merchants Bank</b> California's Strongest, since 1907 Tustin Office fmb.com (855) 416-5747	Carol Watson	
FOR <u> fees, on protest</u>	MP	
⑈006303⑈ ⑆122201198⑆ 24 00539 8⑈		

05271  
 EXHIBIT O  
 000652

DEFENDANTS

# EXHIBIT P

Amber A. Logan, CSB #166395  
**Logan Mathevosian & Hur LLP**  
Equitable Plaza, Suite 2740  
3435 Wilshire Boulevard  
Los Angeles, California 90010-2014  
(213)365-2703  
[LMH@lmhfirm.com](mailto:LMH@lmhfirm.com)  
[amberlogan@lmhfirm.com](mailto:amberlogan@lmhfirm.com)

Attorney for Defendants,  
County of Los Angeles, John Roth, and Wyatt Waldron

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

ANA PATRICIA FERNANDEZ,  
an individual,

Plaintiff,

v.

LOS ANGELES COUNTY, et al.,

Defendants.

Case No.: 2:20-cv-09876 DMG (PDx)

**DEFENDANT LOS ANGELES  
COUNTY'S SUPPLEMENTAL  
RESPONSE TO PLAINTIFF'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE**

PROPOUNDING PARTY: Plaintiff, Ana Patricia Fernandez

RESPONDING PARTY: Defendant, Los Angeles County

SET NO: One (Supplemental)

Defendant County of Los Angeles hereby supplements its response to  
Plaintiff's Requests for Production of Documents, set one, as follows:

1 It should be noted that the responding party has not completed investigation  
2 of the facts related to this case, has not fully completed discovery in this case and  
3 has not completed preparation for trial. All of the answers contained herein are  
4 based only upon such information and documents which are presently available to  
5 and specifically known to the respondent and disclosed based on those contentions.  
6 It is anticipated that further discovery, independent investigation, legal research, and  
7 analysis will supply additional facts, add meaning to known facts, as well as  
8 establish entirely new factual conclusions and legal contentions, all of which may  
9 lead to substantial additions to, changes in, and variations from the contentions  
10 herein set forth. The following responses are given without prejudice to  
11 respondent's right of any subsequently discovered facts and/or documents. The  
12 respondent accordingly reserves the right to change any and all answers herein as  
13 additional documents and/or facts are ascertained, analysis is made, legal research is  
14 completed, and contentions are made. The responses are made in a good faith effort  
15 to supply as much factual information and as much specification of legal contentions  
16 as is presently known but should in no way be to the prejudice of respondent in  
17 relation to further discovery, research, or analysis. Moreover, the responses do not  
18 constitute a waiver of any further objections, privileges, or defenses that are  
19 subsequently discovered.  
20  
21  
22

23 This responding party has made a diligent effort to obtain the information and  
24 documents necessary to respond to these requests. These introductory comments  
25 shall apply to each, and every answer given herein and shall be incorporated by  
26 reference as though fully set forth in all of the responses appearing on the following  
27  
28

1 pages. Finally, as some of these responses may have been ascertained by this  
2 responding party's attorneys and investigators, this responding party may not have  
3 personal knowledge of the information from which these responses are derived.

4 To the extent that any of these requests call for responses/documents which  
5 are protected by the attorney/client and/or attorney work product privileges, this  
6 responding party objects to said requests on that basis.

7 To the extent that any of these requests call for responses/documents which are  
8 of a confidential and proprietary nature as protected by the United States Constitution,  
9 the California Constitution, this party objects to said requests on that basis.  
10

11 To the extent that any of the requests call for responses/documents which are  
12 protected by any additional privileges, this responding party objects to answering  
13 said requests on that basis.

14 **SUPPLEMENTAL RESPONSE TO REQUESTS FOR PRODUCTION**

15 **Request for Production No. 8**

16 ANY DOCUMENTS CONCERNING the calculation of the FIREARM  
17 STORAGE FEE, including, but not limited to, ANY factors considered in making  
18 the calculation, the methodology used, and ANY PERSONS involved in the  
19 determination.  
20  
21

22 **Supplemental Response to Request No. 8:**

23 This defendant will produce the following wage and hour information for the  
24 employees involved in the seizure, storage, retention and transfer of the Fernandez  
25 Firearms. (Bates Nos. 6332-6333).  
26  
27  
28

**Request for Production No. 10**

ANY DOCUMENTS CONCERNING the actual costs incurred by the COUNTY when seizing, storing, OR returning firearms seized by the COUNTY.

**Supplemental Response to Request No. 10:**

This defendant will produce the following wage and hour information for the employees involved in the seizure, storage, retention and transfer of the Fernandez Firearms. (Bates Nos. 6332-6333).

**Request for Production No. 11**

ANY DOCUMENTS CONCERNING the actual costs incurred by the COUNTY when seizing, storing, OR returning the FERNANDEZ FIREARMS.

**Supplemental Response to Request No. 11**

This defendant will produce the following wage and hour information for the employees involved in the seizure, storage, retention and transfer of the Fernandez Firearms. (Bates Nos. 6332-6333).

**Request for Production No. 12**

ANY financial statements, bills, invoices, receipts, OR OTHER DOCUMENTS evidencing the actual costs incurred by the COUNTY in the storage of the FERNANDEZ FIREARMS.


**Supplemental Response to Request No. 12:**

This defendant will produce the following wage and hour information for the employees involved in the seizure, storage, retention and transfer of the Fernandez

1 Firearms. (Bates Nos. 6332-6333).

2 DATED: October 6, 2023

LOGAN MATHEVOSIAN & HUR, LLP

3  
4 By:   
5 AMBER A. LOGAN  
6 Attorney for Defendant,  
County of Los Angeles

	QSAL 7/31/2018		QSAL 12/20/2019	
	Monthly	Hourly	Monthly	Hourly
Susan O'Leary Brown (#547709)	\$ 4,916.00	\$ 28.25	\$ 5,139.64	\$ 29.54
Chris Argonza (#505860), CPE custodian	\$ 5,001.82	\$ 28.75	\$ 5,756.28	\$ 33.08
Jose E. Lingat, Jr. (#520074), CPE custodian	\$ 5,001.82	\$ 28.75	\$ 5,307.00	\$ 30.50
Manuel Nuyda (#249202), CPE Custodian.	\$ 5,574.64	\$ 32.04	\$ 5,914.82	\$ 33.99
Romeo F. Uy (#469509), CPE custodian	\$ 5,001.82	\$ 28.75	\$ 5,307.00	\$ 30.50
Regalado O. Javate, CPE custodian	\$ 5,574.64	\$ 32.04	\$ 5,914.82	\$ 33.99

	QSAL 6/30/2018	
	Monthly	Hourly
Lt. Joshua Barton (#468952)	\$ 13,136.28	\$ 75.59
Deputy Kyle Dingman (#602363)	\$ 8,140.43	\$ 46.78
Sgt. Allen Dollens (408547)	\$ 11,854.92	\$ 68.22
Lt. Brian Gillis, (#406821)	\$ 14,087.54	\$ 81.05
Sgt. Nathan Grimes (#468754)	\$ 9,771.48	\$ 56.25
Deputy Murray Jacob (#513465)	\$ 8,304.67	\$ 47.75
Deputy Aaron W. King (#288356)	\$ 11,687.01	\$ 67.35
Sgt. Theodore Knott (#454251)	\$ 11,390.65	\$ 65.56
Sgt. Richard Leon (#424956)	\$ 9,085.75	\$ 52.31
Deputy Jonathon Livingston (#527888)	\$ 8,817.55	\$ 50.70
Deputy Christopher May (#532344)	\$ 8,304.67	\$ 47.73
Deputy Salvador Moreno, (#606047)	\$ 7,705.33	\$ 44.28
Deputy Christopher Morris (#527190)	\$ 8,643.17	\$ 49.77
Sgt. Joshua Nemeth (#531796)	\$ 8,140.43	\$ 46.78
Deputy David Roach (#513432)	\$ 8,140.43	\$ 46.88
Deputy John Roth (#514758).	\$ 8,861.69	\$ 51.02
Deputy Cesar Vilanova (#546551)	\$ 8,817.55	\$ 50.68
Sgt. Wyatt Waldron (#521031)	\$ 8,817.55	\$ 50.77
Linda McGuire (Sheriff Station Clerk) (#616613)	\$ 3,986.92	\$ 22.91
David Sanchez (Sheriff Station Clerk) (#630110)	\$ 3,581.74	\$ 21.16
David Wonser ) (Sheriff Station Clerk) (#610367	\$ 3,779.28	\$ 21.72
Martha Exconde (Sheriff Station Clerk) (#629959)	\$ 3,581.74	\$ 20.58

Shari McClaran (Sheriff Station Clerk) (#629783)	\$ 3,581.74	\$ 20.58
Monica Zepeda (Sheriff Station Clerk) (#620308)	\$ 3,986.92	\$ 22.91
Deputy Jason Aames (#478581)	\$ 9,408.96	\$ 54.17
Sgt. Eric Eitner (#432022) - retired	\$ 11,390.65	\$ 65.65
Deputy Kevin Bowes (#602442)	\$ 8,140.43	\$ 46.78
Deputy Ryan Thompson (#600320)	\$ 8,388.03	\$ 48.21
Deputy Joshua Mejia (#462487)	\$ 8,388.03	\$ 48.21

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

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: 3435 Wilshire Boulevard, Suite 2740, Los Angeles, California 90010.

On October 6, 2023, I served the document described as: **DEFENDANT LOS ANGELES COUNTY'S SUPPLEMENTAL RESPONSE TO PLAINTFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE** on the interested parties in this action by electronic notification as follows:

**C.D. Michel  
Anna M. Barvir  
Matthew D. Cubeiro  
Konstadinos T. Moros  
MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Boulevard, Suite 200  
Long Beach, CA 90802**

Email Addresses: [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
[abarvir@michellawyers.com](mailto:abarvir@michellawyers.com)  
[mcubeiro@michellawyers.com](mailto:mcubeiro@michellawyers.com)  
[kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
Attorneys for Plaintiff, Ana Patricia Fernandez

**[BY E-MAIL]** I caused the above-mentioned document to be served via electronic mail to the e-mail addresses of the addressee(s) as indicated above. No electronic message or other indication that the transmission was unsuccessful was received. The electronic service address from which the document was served is [lmh@lmhfirm.com](mailto:lmh@lmhfirm.com).

**[FEDERAL]** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed this 6<sup>th</sup> day of October 2023 in Los Angeles, California.

*P. Garcia*  
\_\_\_\_\_  
PATRICIA GARCIA


# EXHIBIT Q

**From:** [Matthew D. Cubeiro](#)  
**To:** [Bardon, Joshua A.](#)  
**Cc:** [Oleary-Brown, Susan M.](#)  
**Subject:** RE: Fernandez Estate [MA-Interwoven.FID80055]  
**Date:** Monday, December 9, 2019 4:10:29 PM  
**Attachments:** [image001.png](#)

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No solution as of yet, so we will pay fees under protest as discussed with County Counsel's office.

A representative from Carol's Auction company will pay the fee on our client's behalf and should contact you shortly.

<b>Matthew D. Cubeiro</b> Attorney 	Direct: (562) 216-4465 Main: (562) 216-4444 Fax: (562) 216-4445 Email: <a href="mailto:MCubeiro@michellawyers.com">MCubeiro@michellawyers.com</a> Web: <a href="http://www.michellawyers.com">www.michellawyers.com</a> 180 E. Ocean Blvd. Suite 200 Long Beach, CA 90802
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This e-mail is confidential and is legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Michel & Associates, PC at (562) 216-4444 if you need assistance.

---

**From:** Bardon, Joshua A. <[JABardon@lasd.org](mailto:JABardon@lasd.org)>  
**Sent:** Monday, December 9, 2019 4:05 PM  
**To:** Matthew D. Cubeiro <[MCubeiro@michellawyers.com](mailto:MCubeiro@michellawyers.com)>  
**Cc:** Oleary-Brown, Susan M. <[smoleary@lasd.org](mailto:smoleary@lasd.org)>  
**Subject:** RE: Fernandez Estate [MA-Interwoven.FID80055]

What was the outcome of the fees with County Counsel?

---

**From:** Matthew D. Cubeiro [<mailto:MCubeiro@michellawyers.com>]  
**Sent:** Monday, December 9, 2019 2:51 PM  
**To:** Bardon, Joshua A. <[JABardon@lasd.org](mailto:JABardon@lasd.org)>; Oleary-Brown, Susan M. <[smoleary@lasd.org](mailto:smoleary@lasd.org)>  
**Cc:** [carol@cwocauctions.com](mailto:carol@cwocauctions.com)  
**Subject:** Fernandez Estate [MA-Interwoven.FID80055]

Lt. Bardon and Ms. O'Leary-Brown,

Thank you for your patience regarding the Fernandez matter. Please note that Carol Watson's will be in contact shortly to arrange collection of the firearms. Let me know if you have any questions or if I can be of any assistance in the transfer.

-Matt

<b>Matthew D. Cubeiro</b> Attorney	Direct: (562) 216-4465 Main: (562) 216-4444 Fax: (562) 216-4445
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This e-mail is confidential and is legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. To do so could violate state and Federal privacy laws. Thank you for your cooperation. Please contact Michel & Associates, PC at (562) 216-4444 if you need assistance.

# **EXHIBIT R**

SENIOR PARTNER  
C. D. MICHEL\*

MANAGING PARTNER  
JOSHUA ROBERT DALE

SPECIAL COUNSEL  
ANNA M. BARVIR  
SEAN A. BRADY  
MATTHEW D. CUBEIRO  
W. LEE SMITH

ASSOCIATES  
TIFFANY D. CHEUVRONT  
ALEXANDER A. FRANK  
KONSTADINOS T. MOROS  
LOS ANGELES, CA



OF COUNSEL  
JASON A. DAVIS  
JOSEPH DI MONDA  
SCOTT M. FRANKLIN  
CLINT B. MONFORT  
MICHAEL W. PRICE  
TAMARA M. RIDER  
LOS ANGELES, CA

\* ALSO ADMITTED IN TEXAS AND THE  
DISTRICT OF COLUMBIA

WRITER'S DIRECT CONTACT:  
562-216-4465  
MCUBEIRO@MICHELLAWYERS.COM

December 9, 2019

**VIA EMAIL & U.S. MAIL**

Lana Choi, Esq.  
Deputy County Counsel  
Sheriff's Legal Advisory Unit, Hall of Justice  
211 W. Temple Street  
Los Angeles, CA 90012  
[LChoi@counsel.lacounty.gov](mailto:LChoi@counsel.lacounty.gov)

**Re: Patricia Fernandez Firearms Administrative Fee**

Dear Ms. Choi:

Per your email dated December 5, 2019 (attached), we are submitting this letter to you to confirm that our client, Patricia Fernandez, will pay the demanded "administrative fees" in order to recover her seized firearm collection that is currently in the county's possession. Despite our requests, the county has refused to lower the amount of these fees, so our client will pay the fees under protest. Her payment of what we believe is an unconstitutional fine is not a concession of the legality of the fees, nor a waiver of her rights. She is paying these fees under protest in order to get the firearms out of the possession of the county as soon as possible, and to stop any claim that the continued storage of the firearms justifies the current or any additional storage fees.

The attached November 22, 2005 letter to the Los Angeles County Board of Supervisors from then-Sheriff Leroy D. Baca shows that the \$54 per-firearm administrative fee being imposed was never intended to apply to a situation such as the one Mrs. Fernandez now finds herself in. That letter states on page two: "*An analysis of firearms evidence processing over a four-year period revealed that potentially 500 guns per year would be eligible for the administrative fee. A \$54 fee would yield additional revenue of approximately \$27,000 each year.*"

Here, there are over 550 guns from one individual, whereas the 2005 letter was assuming 500 total guns seized for roughly 500 individuals per year. The letter demonstrates that the administrative fee did not contemplate a large collection of firearms from one individual. The Supreme Court of the United States recently ruled that the Eighth Amendment's protection against excessive fines is incorporated to the states through the due process clause of the 14<sup>th</sup> amendment. (*Timbs v. Indiana* (2019) 139 S.Ct. 682 [203 L.Ed.2d 11].)

Ms. Lana Choi  
December 9, 2019  
Page 2 of 2

Mrs. Fernandez is paying the fees demanded by the county only with the understanding that the payment of these demanded “administrative fees” is not an acquiescence nor admission as to the reasonableness, legality or constitutionality of the fees being unilaterally imposed. An “administrative fee” well in excess of \$20,000 to recover one’s seized property is not an administrative fee at all, but rather an unconstitutional excessive fine. In making this payment Mrs. Fernandez **reserves the right** to contest these fees and bring suit in order to recover some or all of the payment.

A representative from Carol Watson’s Orange Coast Auctions, a state and federally licensed firearms dealer, will work with LASD Palmdale Station staff to retrieve the firearms on behalf Mrs. Fernandez. The representative will pay the fees demanded by the county on Mrs. Fernandez’ behalf.

Our client remains open to negotiating a significantly lowered total fee amount with the county in which case she would agree to waive any claims she has against the county. Please feel free to contact me if the county reconsiders its position on negotiating a lowered fee, or to discuss any other questions or concerns.

Sincerely,  
**Michel & Associates, P.C.**



Matthew D. Cubeiro

**From:** Lana Choi <[LChoi@counsel.lacounty.gov](mailto:LChoi@counsel.lacounty.gov)>  
**Sent:** Thursday, December 5, 2019 10:56 AM  
**To:** Matthew D. Cubeiro <[MCubeiro@michellawyers.com](mailto:MCubeiro@michellawyers.com)>  
**Subject:** RE: 11/22/2005 Board Minutes and Action [MA-Interwoven.FID80055]

Hi Matt—

We would not sign any stipulation, but you are free to submit a letter when the firearms are recovered preserving any rights your client may have to challenge the fee. Thanks.

-lana

Lana Choi  
Deputy County Counsel  
Sheriff's Services Division  
(213) 229-3097

Notice of Confidential Communication: This message is intended only for the use of the individual or entity to which it is addressed. This message contains information from the County Counsel's Office, attorneys for the County of Los Angeles, which may be privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the person responsible for delivery to the intended recipient, this will notify you that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify our Office at 213-229-3097 and destroy this message.

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**From:** Matthew D. Cubeiro <[MCubeiro@michellawyers.com](mailto:MCubeiro@michellawyers.com)>  
**Sent:** Wednesday, December 4, 2019 12:22 PM  
**To:** Lana Choi <[LChoi@counsel.lacounty.gov](mailto:LChoi@counsel.lacounty.gov)>  
**Subject:** RE: 11/22/2005 Board Minutes and Action [MA-Interwoven.FID80055]

**CAUTION:** External Email. Proceed Responsibly.

Hi Lana,

Just wanted to check in with you on this. Hope you had good Thanksgiving.

-Matt

**Matthew D. Cubeiro**  
Attorney

Direct: (562) 216-4465  
Main: (562) 216-4444  
Fax: (562) 216-4445  
Email: [MCubeiro@michellawyers.com](mailto:MCubeiro@michellawyers.com)  
Web: [http://secure-web.cisco.com/1awYMrRWgZSKDy5NjwXlyPYaxBopT0ui5e1gkQMhgxMxPfm2vc6GI4CNTzzg3nQqRHFgoNDA-LwQM3PuRfpVS3mP1e2\\_Vya5rcmVeORWnvOFNgLQD-AJvz9DKA3oDm5rgvqZ6JhiKoWFhvj30OF4ohchcJCABGbtlwvx8ewKqJFbT2RznGAea2lhWVqscpA7XIH6Cwh7aqlegi8emny8M3qfpgeXR4aWX8uwAqiqOunlPF9anRN2-10pGfaKHQUdItMSgqJPf-k8TFqD7Pp2b\\_J8agP3Ttphb2d2lvq-](http://secure-web.cisco.com/1awYMrRWgZSKDy5NjwXlyPYaxBopT0ui5e1gkQMhgxMxPfm2vc6GI4CNTzzg3nQqRHFgoNDA-LwQM3PuRfpVS3mP1e2_Vya5rcmVeORWnvOFNgLQD-AJvz9DKA3oDm5rgvqZ6JhiKoWFhvj30OF4ohchcJCABGbtlwvx8ewKqJFbT2RznGAea2lhWVqscpA7XIH6Cwh7aqlegi8emny8M3qfpgeXR4aWX8uwAqiqOunlPF9anRN2-10pGfaKHQUdItMSgqJPf-k8TFqD7Pp2b_J8agP3Ttphb2d2lvq-)

**EXHIBIT S**



COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

MARY C. WICKHAM  
County Counsel

April 27, 2020

TELEPHONE  
(213) 974-1913  
FACSIMILE  
(213) 687-8822  
TDD  
(213) 633-0901

Matthew D. Cubeiro  
180 E. Ocean Blvd., Suite 200  
Long Beach, California 90802

<b>Re:</b>	<b>Claim Presented:</b>	<b>February 27, 2020</b>
	<b>File Number:</b>	<b>20-1158496*001</b>
	<b>Your Client:</b>	<b>Fernandez, Patricia</b>

Dear Claimant:

Notice is hereby given that the claim that you presented to the County of Los Angeles, Board of Supervisors on **February 27, 2020**, was rejected on **April 23, 2020**. No further action will be taken on this matter.

WARNING

Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action on this claim. See Government Code Section 945.6.

This time limitation applies only to causes of action for which Government Code Sections 900 - 915.4 require you to present a claim. Other causes of action, including those arising under federal law, may have different time limitations.

HOA.102853945.1

FER01341


**EXHIBIT S**  
**000670**

Matthew D. Cubeiro  
April 27, 2020  
Page 2

You may seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.

Very truly yours,

MARY C. WICKHAM  
County Counsel

By  for  
JOSEPH A. LANGTON  
Principal Deputy County Counsel  
Litigation Monitoring Team

JAL:nt

**PROOF OF SERVICE**

File No. 20-1158496\*001

STATE OF CALIFORNIA, County of Los Angeles:

Nicole Thomas states: I am employed in the County of Los Angeles, State of California, over the age of eighteen years and not a party to the within action. My business address is 648 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012-2713

That on **April 28**, 2020, I served the attached

**NOTICE OF DENIAL LETTER**

upon Interested Party(ies) by placing ☒ the original ☐ a true copy thereof enclosed in a sealed envelope addressed ☒ as follows ☐ as stated on the attached service list:

Matthew D. Cubeiro  
180 E. Ocean Blvd., Suite 200  
Long Beach, California 90802

☒ **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses on the attached service list (specify one):

(1) ☐ deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

(2) ☒ placed the envelope for collection and mailing, following ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **April 28**, 2020, at Los Angeles, California.

Nicole Thomas  
(NAME OF DECLARANT)

[Signature]  
(SIGNATURE OF DECLARANT)

FER01343

HOA.102853936.1

**EXHIBIT S**  
**000672**