	DRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY: alefsky (SBN 95477); Laura Lively Babashoff	STATE BAR NUMBER	Reserved for Clerk's File Stamp		
(SBN 3239	022); Matthew J. Wyatt (SBN 343074)				
	N & FOERSTER LLP re Boulevard, Suite 6000				
	es, CA 90017-3545				
E-MAIL A	DDRESS (Optional): DMarmalefsky@mofo.com; LLively@mofo.com	tional): 213.892.5454			
	RNEY FOR (Name): Defendant State of California RIOR COURT OF CALIFORNIA, COUN	TY OF LOS ANGELES			
COURTHO	USE ADDRESS:				
	ill Street, Los Angeles, CA 90012				
PLAINTIFF Michele					
DEFENDA					
State of	California				
	INFORMAL DISCOVERY CON				
	(pursuant to the Discovery Resolution Stipula	ation of the parties)	23STCV07718		
1.	This document relates to:				
	<ul> <li>Request for Informal Discovery Conference</li> <li>Answer to Request for Informal Discovery Conference</li> </ul>				
2.	Deadline for Court to decide on Request:	•	te 10 calendar days following filing of		
3.	the Request). Deadline for Court to hold Informal Discovery Conference: 05/15/2024 (insert date 20 calendar				
	days following filing of the Request). For a Request for Informal Discover				
	discovery dispute, including the facts and legal arguments at issue. For an Answer to Request for Informal Discovery Conference, <u>briefly</u> describe why the Court should deny the requested discovery, including the facts and legal arguments at issue.				
	Issue #1: Plaintiff requests documents that are covered to protections, including attorney-client communications being product generated by Morrison Foerster attorneys during filing of lawsuits after the inadvertent disclosure at issue relationship with Morrison Foerster was investigative miss Morrison & Foerster to conduct an independent investigat provide legal advice regarding its factual findings, and to withholding any relevant pre-existing factual documents to conduct a diligent search to identify any remaining resist that have not already been produced.	tween CA DOJ and Morrison Foerster their investigation of the data exposu- in this matter. Plaintiff's claim that the characterizes the legal nature of the r ation to determine the cause, nature, a make legal recommendations regard collected by Morrison Foerster during	attorneys, and attorney work ure—all of which postdates the dominant purpose of CA DOJ's relationship. CA DOJ engaged and scope of the data exposure, to ing remediation. CA DOJ is not the investigation and is continuing		
	Issue #2: CA DOJ is willing to supplement its response to CA DOJ's response to Form Interrogatory 12.1. CA DOJ interrogatory. Form Interrogatories 12.2 and 12.3 reques Morrison Foerster during its investigation into the data ex- protection because disclosing the identity of those individ tactics, impressions, or evaluation of the data exposure. privilege to the extent it asks CA DOJ to identify which all CA DOJ is not withholding information for this interrogator has not claimed privilege with respect to Form Interrogat CA DOJ's contentions about Plaintiff's injuries are prema- lssue #3: There is no dispute regarding the format of pro Plaintiff to provide documents and metadata in a format to that required reductions before production compate to prov	is not withholding information on the t information regarding individuals at 0 kposure. The information requested is duals selected for interviewing would r Form Interrogatory 15.1 calls for infor llegations in the First Amended Comp ory on any other privilege basis. Contr ories 16.1-16.3. Nevertheless, those i ature before CA DOJ has deposed Pla duction. CA DOJ has at all times bee that is usable to Plaintiff and reasonal	basis of privilege for this CA DOJ who were interviewed by entitled to absolute work product reveal Morrison Foerster attorneys' mation protected by attorney-client laint CA DOJ deems "material." ary to Plaintiff's assertion, CA DOJ nterrogatories as they pertain to aintiff.		
	that required redactions before production cannot be pro documents as standard .tiff files. CA DOJ can re-produc production in a load file containing metadata, including a responsive. CA DOJ has further produced Excel spreads DOJ has at all times been and remains willing to reconfig	the them in PDF format if plaintiff prefer field indicating to which document re- sheets listing the request number(s) as	rs. CA DOJ has provided each quest number(s) each document is ssociated with each document. CA		

1	PROOF OF SERVICE				
2	I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address				
3	is 707 Wilshire Boulevard, Suite 6000, Los Angeles, California 90017-3543. I am not a party to the within cause, and I am over the age of eighteen years.				
4	I further declare that on April 29, 2024, I served on the parties below a copy of:				
5	• DEFENDANT STATE OF CALIFORNIA'S ANSWER TO REQUEST				
6	FOR INFORMAL DISCOVERY CONFERENCE				
7	×	BY ELECTRONIC SERVICE [Co electronically mailing a true and corr	<b>de Civ. Proc sec. 1010.6; CRC 2.251]</b> by ect copy through Morrison & Foerster LLP's		
8		electronic mail system from NMorale below, or as stated on the attached se	es@mofo.com to the email address(es) set forth rvice list per agreement in accordance with Code of		
9	Civil Procedure section 1010.6 and CRC Rule 2.251.				
10		C.D. Michel	Attorneys for Plaintiff		
11		Joshua Robert Dale Konstadinos T. Moros	MICHELE HANISEE		
12		Alexander A. Frank MICHEL & ASSOCIATES, P.C.	Telephone: 562.216.4444 Facsimile: 562.216.4445		
13 14		180 E. Ocean Boulevard, Suite 200 Long Beach, California 90802	jdale@michellawyers.com ccastron@michellawyers.com		
14		Long Beach, Camornia 90802	afrank@michellawyers.com		
16	I declare under penalty of perjury under the laws of the State of California that the above is true and correct.				
17	Executed at Whittier, California, this 29th day of April, 2024.				
18		,,,,,,	,		
19					
20		Nubia Morales (typed)	(signature)		
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	1 sf-5928793 Proof of Service				