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5 200 North Main Street  
6 Los Angeles, California 90012-4131  
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8 Attorneys for Defendants  
9 CITY OF LOS ANGELES, DARYL GATES,  
10 and RON NEWTON

11 SUPERIOR COURT OF CALIFORNIA

12 COUNTY OF LOS ANGELES

13 PERI SHEFIK, et al., )  
14 Plaintiffs, )  
15 vs. )  
16 CITY OF LOS ANGELES, et al., )  
17 Defendants. )  
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CASE NO. BC 080 092  
(Reassigned to Judge  
Stephen Lachs)

CITY OF LOS ANGELES' REQUEST  
FOR PRODUCTION OF DOCUMENTS  
AND THINGS (Set No. One)

29 REQUESTING PARTY: CITY OF LOS ANGELES

30 RESPONDING PARTY: PLAINTIFF, SARA DIAMOND

31 SET NUMBER: ONE

32 Pursuant to Section 2031(a) of the Code of Civil  
33 Procedure, Defendant CITY OF LOS ANGELES hereby demands that  
34 Plaintiff SARA DIAMOND identify, produce and permit inspection and  
35 copying of the documents and things described below.

36 Production is to be made on April 7, 1994 at 10:00 a.m. at the  
37 offices of the Los Angeles City Attorney, located at 1800 City Hall  
38 200 North Main Street, Los Angeles, California, 90012.

1           As used herein, "documents" refer to all written, recorded  
2 or other physically preserved material regardless of the form or  
3 medium of recording. The term "documents" includes any tangible  
4 preservation of any expression, communication or representation,  
5 including but not limited to: handwriting, typewriting, printing,  
6 photostating, photographing, magnetic impulse, computer output, or  
7 mechanical or electrical records, or tape recordings or other  
8 phonographic record, or laser disc or computer diskettes, etc.  
9 and/or any nonidentical copies thereof. The term "document"  
10 includes any portion of a document. The term "documents" also  
11 includes but is not limited to legal documents, records, forms,  
12 letters, diaries, desk calendars, notes, notebooks, telegrams,  
13 telexes, telefaxes, telecopies, microfiche, microfilm data, audits,  
14 test tapes, test data sheets, computer disks, computer databases,  
15 reports generated from computer databases, test reports, graphs,  
16 drawings, blueprints, appointment books, illustrations, directives,  
17 journals, manuals, statements, receipts, reports, books of account,  
18 invoices, checks, telephone bills, medical records, medical reports,  
19 medical charts, medical tests, resumes, training manuals or  
20 pamphlets, handouts, videotapes, policy statements, logs and any and  
21 all other writings, summaries and recording of every kind that are  
22 in your actual or constructive control or reasonably accessible to  
23 you.

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25       \* REQUEST FOR PRODUCTION NO. 1:

26           Documents relating to the rally on May 2, 1992 at Parker  
27 Center in Downtown Los Angeles to protest the Rodney King verdicts.

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\* REQUEST FOR PRODUCTION NO. 2:

Documents relating to your decision to participate in the rally on May 2, 1992 at Parker Center in Downtown Los Angeles to protest the Rodney King verdicts.

\* REQUEST FOR PRODUCTION NO. 3:

Documents relating to your arrest and incarceration following the rally on May 2, 1992 at Parker Center in Downtown Los Angeles to protest the Rodney King verdicts.

\* REQUEST FOR PRODUCTION NO. 4:

Documents relating to any physical, mental, or emotional conditions which you attribute in whole or in part to your arrest or incarceration following the rally on May 2, 1992 at Parker Center in Downtown Los Angeles to protest the Rodney King verdicts.

\* REQUEST FOR PRODUCTION NO. 5:

Documents relating to any communication not protected by the attorney-client privilege regarding the rally on May 2, 1992 at Parker Center in Downtown Los Angeles to protest the Rodney King verdicts.

\* REQUEST FOR PRODUCTION NO. 6:

Documents relating any communication not protected by the attorney-client privilege regarding your participation in the rally on May 2, 1992 at Parker Center in Downtown Los Angeles to protest the Rodney King verdicts.

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1                   REQUEST FOR PRODUCTION NO. 7:

2                   Documents relating to any communication not protected by  
3 the attorney-client privilege regarding your arrest and  
4 incarceration following the rally on May 2, 1992 at Parker Center in  
5 Downtown Los Angeles to protest the Rodney King verdicts.

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7                   REQUEST FOR PRODUCTION NO. 8:

8                   Documents relating to any communication not protected by  
9 the attorney-client privilege regarding your physical, mental, or  
10 emotional conditions which you attribute in whole or in part to your  
11 arrest or incarceration.


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13                   \* REQUEST FOR PRODUCTION NO. 9:

14                   Documents relating to any communication not protected by  
15 the attorney-client privilege regarding the instant lawsuit.

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17 DATED: February 28, 1994

JAMES K. HAHN, City Attorney  
FREDERICK N. MERKIN, Senior  
Assistant City Attorney  
ARTHUR B. WALSH,  
Deputy City Attorney

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21 By

  
ARTHUR B. WALSH  
Deputy City Attorney

22  
23 Attorneys for Defendants CITY OF  
24 LOS ANGELES, DARYL GATES, and RON  
25 NEWTON  
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PROOF OF SERVICE BY MAIL

I, the undersigned, say: I am over the age of 18 years and not a party to the within action or proceeding. My business address is 1800 City Hall East, 200 North Main Street, Los Angeles, California, 90012.

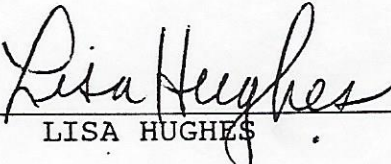
On February 28, 1994, I served the within CITY OF LOS ANGELES' REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS SET NO. ONE) AS TO EACH INDIVIDUAL PLAINTIFF ON ATTACHED LIST on the person(s) indicated below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Los Angeles, California, addressed as follows:

Robin Toma, Esq.  
ACLU Foundation of Southern  
California  
1616 Beverly Boulevard  
Los Angeles, CA 90026

[ ] - 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.

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

Executed on February 28, 1994, at Los Angeles, California.

  
\_\_\_\_\_  
LISA HUGHES

PLAINTIFF LIST

Peri Shefik	David R. Afshartous	Henrietta Allarid
Kenyatta Baker	John Bermudes	Charles Bowens
Daphne Brooks	Charles Bruner	Luzanne Calvo
Susan Chacin	Ray Chavira	Sean Cloherty
Daniel Corning	Colleen Crosby	David Daniels
Derrick Dawson	Lisa Dembling	Sara Diamond
Pamela D. Dill	Carol Downer	Frank Downer, Jr.
Janene Dunbar	Gilbert Encinas	Louis Fleeks
Ginny Garrett	Alicia Harris	Claudia Harris
Lyle Harris	Lisa Hartouni	Roger Hearld
Richard Henry	Sara Hoge	Edward Jackson
Clemente Jiminez	Dolores Johnson	Tanya Kalmar
Aaron Lattimore	Sougi Layfield	Corey Lucas
Eve Luckring	Lusira Mageo	Daniel Matmor
Gary McLaughlin	Yvette Yamilet Medina	Sahara Medrano
Jonathon Most	Ana Cecilia Muench	Anton Muench
John O'Brien	Saleem Rantissi	Claudia Regne
Cheryl Revkin	Krista Saucido	Lothar Schmitz
Jennifer Scott	Mary Skaggs	Tomika Smalls
Jeff Steiner	George Tapia	Matias Viegner
Harry Walker	Anne Walsh	David Widom
Martha Williams		