

Heather Aubry
Tel. (213) 978-8393
Fax (213) 978-8787
Heather.aubry@lacity.org

MICHAEL N. FEUER
CITY ATTORNEY

March 30, 2017

VIA UPS

Chief Justice and Associate Justices of the
Supreme Court
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-4797

Re: *American Civil Liberties Union Foundation of Southern California et al., Petitioners, v. Superior Court of Los Angeles County, Respondent; City of Los Angeles et al., Real Parties in Interest. (S277106)*

Honorable Chief Justice and Associate Justices:

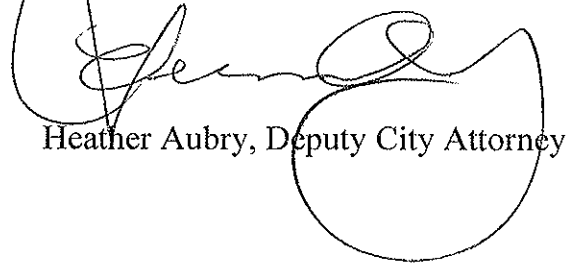
Real Party in Interest City of Los Angeles hereby responds to the Court's request that the parties serve and file supplemental letter briefs addressing the following question: Whether the catchall exemption of Government Code section 6255, subdivision (a) applies to any or all of the automatic license plate reader (ALPR) data collected by real parties during the one-week period in August, 2012, that is the subject of this Court's review under the California Public Records Act. (Gov. Code, § 6250, *et seq.*).

The City of Los Angeles submits that the exemption afforded by Government Code section 6255 applies to all of the ALPR data collected during the one-week period specified in the subject Public Records Act request, as the exemption applies to all ALPR data collected by real parties, regardless of when it was collected.

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of the Supreme Court
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In support of this initial response to the Court's question, the City of Los Angeles relies on its briefing in the Court of Appeal addressing the applicability of Government Code section 6255 at pages 19 through 41. The City reserves the right to serve and file a reply to any supplemental letter briefs filed by the parties and amici curiae.

Respectfully submitted,
MICHAEL N. FEUER, City Attorney

A handwritten signature in black ink, appearing to read "Heather Aubry", is written over a large, faint circular stamp or watermark. The signature is fluid and cursive.

Heather Aubry, Deputy City Attorney

HA/aa

PROOF OF SERVICE BY VARIOUS METHODS

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 200 N. Main Street, City Hall East Room 800, Los Angeles, CA 90012.

On March 30, 2017, I served the foregoing document described as:

LETTER BRIEF

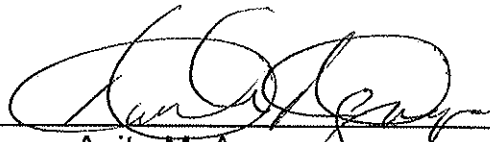
on all interested parties by transmitting a copy addressed as follows:

SEE ATTACHED SERVICE LIST

[X] BY MAIL – I am readily familiar with the practice of the Los Angeles City Attorney’s Office for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is placed for collection and mailing. On the date referenced above, I placed a true copy of the above documents(s) in a sealed envelope and placed it for collection in the proper place in our office 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.

Dated: March 30, 2017



Anita M. Aguayo

SERVICE LIST

American Civil Liberties Union Foundation of Southern California
v.
Superior Court (County of Los Angeles)
Case No. S227106

VIA OVERNIGHT MAIL

Clerk of the Supreme Court
Earl Warren Building
350 McAllister Street
San Francisco, CA 94102

VIA U.S. MAIL

Clerk of the Court of Appeal
2nd Appellant District
Division Three
Ronald Reagan State Building
300 South Spring Street
2nd Floor, North Tower
Los Angeles, CA 90013-1213

Hon. James C. Chalfant
Superior Court of Los Angeles County
111 North Hill Street, Dept. 85
Los Angeles, CA 90012

Respondent

Frederick Bennett
Superior court of Los Angeles County
111 North Hill Street, Room 546
Los Angeles, CA 90012

Respondent

Tomas A. Guterres, Esq.
Eric C. Brown, Esq.
James Jardin
MUIR & STEWART LLP
1100 El Centro Street
South Pasadena, CA 91030
ebrown@ccmslaw.com

**Attorneys for Real Party in
Interest: County of L.A.**

Peter Bibring, Esq.
ACLU FOUNDATION OF SOUTHERN CALIFORNIA
1313 West Eight Street
Los Angeles, CA 90017
Tel. (213) 977-9500; Fax (213) 977-5299
pbibring@aclu-sc.org

**Attorney for Petitioner:
ACLU Foundation of
Southern California**

Jennifer Lynch, Esq.
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
Tel. (415) 436-9333; Fax (415) 436-9993
jlynch@eff.org

**Attorney for Petitioner:
Electronic Frontier
Foundation**

Martin J. Mayer, Esq.
James Touchstone, Esq.
Deborah Pernice-Knefel, Esq.
Jones & Mayer
3777 N. Harbor Blvd.
Fullerton, CA 92835

**Attorney for Amicus curiae:
California State Sheriff's
Association, et al.**

James R. Wheaton
Cherokee D.M. Melton
FIRST AMENDMENT PROJECT
1736 Franklin Street, 9th Floor
Oakland, CA 94612
wheaton@thefirstamendment.org
cmelton@thefirstamendment.org

**Attorney for Amicus Curiae:
Northern California
Chapter of Society of
Professional Journalists**

Katielynn Boyd Townsend
Reporters Committee for Freedom of
The Press
1156 15th Street NW, Suite 1250
Washington, DC 20005
Tel. (202) 795-9303

**Attorneys for Amicus Curiae:
Reporters Committee for Freedom
of the Press and Media
Organizations**

Alan Butler
Electronic Privacy Info Center
Center
1718 Connecticut Ave., NW, #200
Washington, DC 20009

**Attorney for Amicus curiae
Electronic Privacy Information**

Richard Adam Schwartz, Esq.
300 South Grand Ave., #3400
Los Angeles, CA 90071

**Attorney for Amicus curiae
Jerry Hill**

Michael G. Colantuono
Michael Ryan Cobden
Colantuono, Highsmith & Whatley, PC
420 Sierra College Drive, #140
Grass Valley, CA 95945

**Attorneys for Amicus curiae
California State Assoc. of Counties
and League of California Cities**