

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,

NO. 21-2-11739-9 SEA

Plaintiffs,

**DECLARATION OF SARAH  
GOHMANN BIGELOW IN SUPPORT  
OF CITY OF SEATTLE’S  
OPPOSITION TO PLAINTIFFS’  
MOTION TO COMPEL CURRENT  
ADDRESS OF FORMER MAYOR  
JENNY DURKAN OR A PERSON  
DESIGNATED TO ACCEPT  
SERVICE OF PROCESS ON BEHALF  
OF JENNY DURKAN**

v.

CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,

Defendant.

I, SARAH GOHMANN BIGELOW, hereby state and declare as follows:

1. I am an attorney with Savitt Bruce & Willey LLP, counsel for Defendant City of Seattle (the “City”) in this matter. I am over the age of eighteen and am competent to testify. I make this declaration based on personal knowledge unless otherwise stated herein.

2. In late August and into September 2022, the parties exchanged correspondence regarding discovery matters in this case, including regarding depositions.

3. Attached hereto as **Exhibit A** is a true and correct copy of an email that I sent to Mr. Needle and Ms. Mindenbergs on August 12, 2022.

1           4.       Attached hereto as **Exhibit B** is a true and correct copy of a letter that I received  
2 from Mr. Needle, dated October 4, 2022.

3           5.       Attached hereto as **Exhibit C** is a true and correct copy of a letter that I sent to  
4 Mr. Needle and Ms. Mindenbergs, dated October 20, 2022.

5           6.       Attached hereto as **Exhibit D** is a true and correct copy of the City's Disclosure  
6 of Possible Primary Witnesses that my office served on October 24, 2022. At no time since the  
7 City served its witness disclosure have Plaintiffs asked to discuss or meet and confer regarding  
8 that disclosure.

9           7.       Attached hereto as **Exhibit E** is a true and correct copy of Plaintiffs' Disclosure  
10 of Possible Primary Witnesses that I received on October 24, 2022.

11           8.       Starting in around October 2022, Plaintiffs took the position that depositions  
12 *should not* proceed until Plaintiffs received the City's privileged information that was at issue  
13 in the City's Privilege Motions.<sup>1</sup> Plaintiffs took this position in our discussions at the end of  
14 October 2022. Through the end of 2022 and into 2023, Plaintiffs maintained their position that  
15 depositions should not proceed until Plaintiffs received the City's privileged information at  
16 issue in the City's Privilege Motions, and then also the City's privileged information that  
17 Plaintiffs sought in their November 18, 2022 Revised Motion to Compel Discovery, for In  
18 Camera Review, and the Appointment of a Special Master, all of which became the subject of  
19 the Court's Discovery Orders.<sup>2</sup>

20           9.       On January 18, 2023, I received service of a Motion for Discretionary Review of  
21 the Court's Discovery Orders filed in the Court of Appeals by Plaintiffs. Also on January 18,  
22 2023, I received service of a Motion to Stay Proceedings filed in the Court of Appeals by

23 \_\_\_\_\_  
24 <sup>1</sup> "Privilege Motions" means the City's Motion for Return of Documents Subject to Privilege Claims, filed July 1,  
2022; the City's Motion for Privilege Determination, filed July 1, 2022.

25 <sup>2</sup> "Discovery Orders" means the November 16, 2022 Revised and Updated Order Granting City of Seattle's  
26 Motion for Privilege Determination; the December 2, 2022 Order Denying Motion to Reconsider Determination of  
Privilege; the January 6, 2023 Order Denying Plaintiffs' Motion to Compel, for In Camera Review, and a Special  
Master; and the January 6, 2023 Order Granting Motion to Compel Ferreiro Deposition.

27       DECLARATION OF SARAH GOHMANN BIGELOW IN  
SUPPORT OF CITY OF SEATTLE'S OPPOSITION TO  
PLAINTIFFS' MOTION TO COMPEL CURRENT ADDRESS  
OF FORMER MAYOR JENNY DURKAN OR A PERSON  
DESIGNATED TO ACCEPT SERVICE OF PROCESS ON  
BEHALF OF JENNY DURKAN- 2

SAVITT BRUCE & WILLEY LLP  
1425 Fourth Avenue Suite 800  
Seattle, Washington 98101-2272  
(206) 749-0500

1 Plaintiffs. Attached hereto as **Exhibit F** is a true and correct copy of that Motion to Stay  
2 Proceedings.

3 10. On Friday, February 3, 2023, the Court of Appeals denied the Plaintiffs' Motion  
4 to Stay Proceedings. Attached hereto as **Exhibit G** is a true and correct copy of that Order.

5 11. Attached hereto as **Exhibit H** is a true and correct copy of an email that I  
6 received from Ms. Mindenbergs on Monday, February 6, 2023, after the Court of Appeals  
7 issued its Order denying Plaintiffs' Motion to Stay Proceedings.

8 12. Attached hereto as **Exhibit I** is a true and correct copy of an email that I sent to  
9 Ms. Mindenbergs and Mr. Needle. I did not receive any response to this email or any other  
10 communication from Plaintiffs' counsel regarding my request for a telephone call.

11 **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE**  
12 **STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND**  
13 **CORRECT.**

14 Executed this 22<sup>nd</sup> day of February, 2023, at Seattle, Washington.

15 /s/ Sarah Gohmann Bigelow  
16 Sarah Gohmann Bigelow

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DECLARATION OF SARAH GOHMANN BIGELOW IN  
SUPPORT OF CITY OF SEATTLE'S OPPOSITION TO  
PLAINTIFFS' MOTION TO COMPEL CURRENT ADDRESS  
OF FORMER MAYOR JENNY DURKAN OR A PERSON  
DESIGNATED TO ACCEPT SERVICE OF PROCESS ON  
BEHALF OF JENNY DURKAN- 3

SAVITT BRUCE & WILLEY LLP  
1425 Fourth Avenue Suite 800  
Seattle, Washington 98101-2272  
(206) 749-0500

1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
7 705 Second Avenue, Suite 1050  
8 Seattle, WA 98104  
9 Telephone: (206) 447-1560  
10 Facsimile: (206) 447-1523  
11 Email: [susanmm@msn.com](mailto:susanmm@msn.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

12 *Attorney for Plaintiffs*

13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
15 705 Second Avenue, Suite 1050  
16 Seattle, WA 98104  
17 Telephone: (206) 447-1560  
18 Facsimile: (206) 447-1523  
19 Email: [jneedlel@wolfenet.com](mailto:jneedlel@wolfenet.com)  
20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 DATED this 22<sup>nd</sup> day of February, 2023 at Seattle, Washington.

23  
24  
25  
26  
27  
  
Meghan Parker

# **EXHIBIT A**

**From:** [Sarah Gohmann Bigelow](mailto:Sarah.Gohmann@sbwillp.com)  
**To:** [jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)  
**Cc:** "[Jeffrey Needle](#)"; "[susan mindenbergs](#)"; "[Christine Tobin](#)"; [lropez.paralegal@gmail.com](mailto:lropez.paralegal@gmail.com); [James Savitt](#); [Nathan Garberich](#); [Meghan Parker](#); [Brandi Balanda](#)  
**Subject:** RE: Irwin - Privilege log  
**Date:** Friday, August 12, 2022 3:53:00 PM

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Mr. Needle,

As a preliminary matter, it is imperative that you start sending emails to my correct email address: [sgohmannbigelow@sbwillp.com](mailto:sgohmannbigelow@sbwillp.com). The [gohmannbigelow@sbwillp.com](mailto:gohmannbigelow@sbwillp.com) address that you continue to use does not exist. We have already asked that plaintiffs' counsel use my correct email. Plaintiffs should rely henceforth that emails sent to this non-existent address will not be reviewed or addressed by defense counsel, even if others are included on the string.

I also write to address the issues raised in your recent emails, and further to our recent communications with you about information found on the City's servers regarding Ms. Ferreiro's communications with her counsel.

#### *Depositions*

We expect that our firm will be representing Mr. Barnett, who is a current City employee, and that our firm will be able to accept service on his behalf. He is on vacation, and we will get back to you to confirm this expectation (or to advise that our expectation is incorrect) this coming week when he returns.

We do not represent Ms. Chen, Mr. Fong, Ms. Formas, or Ms. Durkan, and cannot accept service or address dates on their behalf. You have Ms. Chen's attorney's contact information as we recently included you on correspondence to her counsel.

With respect to dates: the week of September 6 does not work for us for Ms. Chen, but we can be available any of September 13, 15, 19, and 21-23. The dates you propose for Mr. Fong, Ms. Formas and Ms. Durkan work on our calendars. We cannot speak for these witnesses. We will get back to you regarding Mr. Barnett promptly when we are able to speak with him.

The City would like to proceed also with depositions. We request one of the following dates for the deposition of Ms. Ferreiro: October 11, 18 or 19. The City may have additional witnesses to depose and will propose other dates for these witnesses.

#### *The City's Production of Documents and Privilege Log*

As we have advised, the City agreed to make productions on a rolling basis in an effort to produce documents as quickly as possible in response to Plaintiffs' voluminous requests. This is documented in correspondence to you and Ms. Mindenbergs. As part of these efforts, the City has been producing documents at regular intervals and has made ten productions to date, the most recent of which on July 19. There is no basis for surprise at the receipt of the City's tenth production of documents on July 19 or for mischaracterizing this most recent production as "delayed."

At this point, the City has produced more than 13,000 pages of documents in response to Plaintiffs' requests and we believe that the City's production is nearing completion. We are in the process of reviewing other locations to verify whether additional responsive documents exist. We expect that these efforts may yield some additional documents and that they can be produced by the end of this month. We will also provide a privilege log for documents not produced on grounds of privilege or work product by the end of this month. We disagree with your suggestion of an "unacceptable" delay in this regard, not least in light of the City's substantial discovery efforts.

*Plaintiffs' Communications with Counsel on City Servers*

Given that Plaintiffs have not asserted any claim of privilege or immunity of discovery with regard to the document we provided to you on July 22, and regarding which we followed up on August 4, the City will cease its sequestration of that document, rely that Plaintiffs do not assert any privilege or immunity from discovery with regard to that document, and proceed accordingly.

SARAH GOHMANN BIGELOW | SAVITT BRUCE & WILLEY LLP | [www.sbwllp.com](http://www.sbwllp.com)

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**Privileged and Confidential:** Please be advised that this message may contain information that is private and legally privileged. If you are not the person for whom this message is intended, please delete it and notify me immediately of the error. Please do not copy or send this message to anyone else. Thank you for your cooperation.

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**From:** Jeffrey Needle <[jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)>

**Sent:** Wednesday, August 10, 2022 2:21 PM

**To:** Brandi Balanda <[bbalanda@sbwllp.com](mailto:bbalanda@sbwllp.com)>; James Savitt <[jsavitt@sbwllp.com](mailto:jsavitt@sbwllp.com)>;  
[gohmannbigelow@sbwllp.com](mailto:gohmannbigelow@sbwllp.com)

**Cc:** 'Jeffrey Needle' <[jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)>; 'susan mindenbergs' <[susanmm@msn.com](mailto:susanmm@msn.com)>;  
'Lonnie Lopez' <[llopez.paralegal@gmail.com](mailto:llopez.paralegal@gmail.com)>; 'Christine Tobin' <[christine@sbmlaw.net](mailto:christine@sbmlaw.net)>

**Subject:** Irwin - Privilege log

Counsel:

In your cover letter dated July 19, 2022, you explain the supplemental document production for Plaintiff's discovery request dated October 26, 2021. There is no explanation why this discovery production was delayed approximately nine months. We reserve our right to seek sanctions for this unjustified and unexplained delay. In relevant part, you state "certain documents have been redacted or withheld in their entirety because they are protected from discovery by the attorney-client privilege and/or work product doctrine. **A privilege log will be forthcoming.**" (Emphasis added). This is not acceptable. We almost certainly intend to challenge the assertion of attorney client privilege and/or work product and must have a privilege log immediately. We reserve our right to argue that the delay in producing the privilege log has waived all asserted privileges.

Jeffrey Needle  
Law Offices of Jeffrey Needle

705 Second Ave. Suite 1050  
Seattle, Washington 98104  
(206) 447-1560  
Jneedlelaw.com

CAUTION: This email originated from outside of your organization. Do not click links or open attachments unless you know it is safe.

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# **EXHIBIT B**

## Law Offices of Jeffrey L. Needle

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705 Second Avenue - Hogue Building  
Suite 1050 - Seattle, Washington 98104  
Tel. (206) 447-1560 - Fax. (206) 447-1523  
[jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

Jeffrey L. Needle  
Lonnie Lopez  
Paralegal

October 4, 2022

VIA EMAIL TO [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)  
VIA EMAIL TO [bbalanda@sbwLLP.com](mailto:bbalanda@sbwLLP.com)  
VIA EMAIL TO [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

James P. Savitt, Esq.  
Brandi B. Balanda, Esq.  
Sarah Gohmann Bigelow, Esq.  
SAVITT BRUCE & WILLEY LLP  
1425 Fourth Avenue, Suite 800  
Seattle, WA 98101

Re: Stacy Irwin and Kimberly Ferreiro v. City of Seattle, Washington  
Case No. 21-2-11739-9 SEA

Dear Counsel:

This letter serves to memorialize the parties' CR 37 Conference of Wednesday, September 28, 2022.

### 1. Chen Deposition:

The parties have agreed to reschedule Ms. Chen's deposition scheduled for September 21 to a time after the City has completed its production of documents to Plaintiffs. The parties will endeavor to reschedule Ms. Chen's deposition before Thanksgiving. Neither party has control over when remaining attorney client privilege issues will be resolved. Plaintiffs will require the resolution of those issues prior to Ms. Chen's deposition.

Plaintiffs anticipate the Ms. Chen's deposition will take two days. Darwin Roberts, attorney for Michelle Chen, will let the parties know by October 5 if the two-day Chen deposition will be on consecutive days or days that are non-consecutive, but reasonably close in time – no longer than a week apart. The City does not object to the non-consecutive days depending on what Chen wants.

The parties agreed that if at the conclusion of Ms. Chen's two-day deposition there is insufficient time for the City to question Ms. Chen, the City may note Ms. Chen's deposition for a different date and that deposition will not count against the 10 depositions it is allowed to take

under the local rules. Plaintiffs will not agree to allocate time to the Defendant to question Ms. Chen from the time authorized by LCR 26(b)(3).

Neither Mr. Roberts nor Plaintiffs' counsel are available for Chen's deposition during the week of November 7, 2022.

### **3. Ms. Ferreiro's Deposition.**

Ms. Ferreiro deposition is currently scheduled for October 20, 2022. That date is stricken. It is anticipated that the Ferreiro deposition can be rescheduled for some time in December after the Chen deposition is concluded. It is Plaintiffs' position that Chen's deposition must be concluded before either of Plaintiffs' depositions and this scheduling may be dependent upon the resolution of outstanding attorney client issues.

### **4. Michell Chen's Claim of Privilege or Privacy.**

Darwin Roberts agreed to provide both parties with a privilege log on or before October 5, 2022. The City will provide plaintiffs with a list of the Chen documents it has sequestered.

### **5. Defendant's Rolling Production.**

The Plaintiffs served upon the Defendant its First Request of Discovery on October 26, 2021. On December 13, 2022, the Defendant responded with what it described as the first of "rolling installments" responsive to Plaintiffs' October Discovery Request. Plaintiffs objected to the production of discovery by rolling installments orally and in an email dated March 29, 2022. Plaintiffs' counsel stated in the email that rolling productions were not unacceptable and that immediate compliance was required. A letter from Brandi Balanda dated April 22, 2022 memorialized that the parties engaged in meet and confer on April 14 and April 20, and that on those occasions the parties addressed Plaintiffs' concerns about the inadequacy of "rolling productions." The City stated that it was going to proceed with rolling productions over the Plaintiffs' objections.

It remains Plaintiffs' position that if the City had responded to discovery as required by Court Rules, the attorney client privilege issues asserted by the Defendant in their late disclosed documents would have been resolved many months ago. Likewise, Plaintiffs could have proceeded with depositions and related discovery much sooner. It is Plaintiffs' position that they have experienced extreme prejudice by the Defendants' insistence on "rolling production" of documents over Plaintiffs' objection.

City has now agreed to complete all document production by October 15, 2022.

## **6. Defendant's 28-Page Privilege Log:**

The City has produced a 28-page privilege log not including those documents presently under an *in camera* review by the court. The privilege log begins at COS 00004151 despite the fact that earlier numbered documents produced by the City have been redacted but do not appear on the privilege log. An example is a copy of the SEEC investigative report (COS\_000009-COS\_000022). The City has agreed to review and get back to Plaintiffs' counsel about an updated privilege log.

Plaintiffs do not intend to challenge any redactions in documents listed in the privilege log dated before August 2020 but do not waive the necessity of a privilege log. Plaintiffs do challenge all redactions in all documents in the privilege log dated August 2020 to present consistent with their objections to those documents presently under *in camera* review. Defendant has not agreed to remove any of the redactions of documents dated August 2020 to present.

## **7. Formas Deposition.**

Stephanie Formas has contacted the City and Savitt Bruce will represent her and accept service of process for her deposition. Plaintiffs will provide proposed dates for the Formas deposition.

## **8. Durkan Deposition.**

Plaintiffs intend to take the deposition of former Mayor Jenny Durkan. Plaintiffs do not have Mayor Durkan's address and therefore are unable to effect service of process. Plaintiffs require that either a representative of the City of Seattle agree to accept service of process on behalf of Mayor Duran or provide Mayor Durkan's last known address. In the alternative, Plaintiffs will file a motion to compel disclosure of her last known address. Defense counsel has agreed to inquire and get back to us.

## **9. Alternative Dispute Resolution:**

The court-imposed deadline for ADR is 2/27/23. The City should be mindful that many mediators are unavailable for at least two months before scheduling. The City will get back to Plaintiffs about the status of mediation.

Savitt Bruce & Willey, LLP  
October 4, 2022  
Page four

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Very truly yours,

/s/ Jeffrey Needle  
Jeffrey Needle  
Susan Mindenbergs  
Attorneys for Plaintiff

Cc: Darwin Roberts

# EXHIBIT C

October 20, 2022

**Via Email/PDF**

Ms. Susan B. Mindenbergs [[susanmm@msn.com](mailto:susanmm@msn.com)]  
LAW OFFICE OF SUSAN B. MINDENBERGS  
705 Second Avenue, Suite 1050  
Seattle, WA 98104

Mr. Jeffrey L. Needle [[jneedle@wolfenet.com](mailto:jneedle@wolfenet.com); [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)]  
LAW OFFICE OF JEFFREY L. NEEDLE  
705 Second Avenue, Suite 1050  
Seattle, WA 98104

Re: *Irwin and Ferreiro v. City of Seattle* / KCSC No. 21-2-11739-9 SEA

Dear Ms. Mindenbergs and Mr. Needle:

We write in reply to your October 4 correspondence. The City's agreements are as stated herein.

**1. Ms. Chen's Deposition.** Plaintiffs are free to determine when they would like to depose Ms. Chen. The vast bulk of the City's documents responsive to Plaintiffs' discovery has long ago been provided, and the City confirmed last week that it has concluded its production. If Plaintiffs wish to delay Ms. Chen's deposition while they challenge or address privilege or other issues, they are free to do so but that is their choice.

The City continues to reserve its right to examine Ms. Chen as part of the deposition of Ms. Chen noticed by Plaintiffs. The authority for this right we provided to you remains unchallenged. We will continue to work with Plaintiffs and with Ms. Chen in hopes of finding an agreement that will avoid the need for motion practice on this issue. We do not agree that the issue would be resolved merely by the City noting its own deposition of Ms. Chen.

We await communication from you regarding when Plaintiffs would like to schedule Ms. Chen's deposition.

Ms. Susan B. Mindenbergs  
Mr. Jeffrey L. Needle  
October 20, 2022  
Page 2

**2. Ms. Ferreiro's Deposition.** The City disagrees that Plaintiffs may delay their depositions until a time of their choosing, or that there is a basis to link the timing of Ms. Ferreiro's deposition with Ms. Chen's. If there is authority for your demand that "Chen's deposition must be concluded before either of Plaintiffs' depositions", please provide such authority.

The City has been requesting dates for the deposition of Ms. Ferreiro since August 12. On September 21, we issued a notice for her deposition on October 20 and reiterated our willingness to find alternative dates if that did not work for her or you. To date Plaintiffs have refused to provide any date at all. Accordingly, we are issuing an Amended Notice of Deposition of Plaintiff Kim Ferreiro herewith, noting Ms. Ferreiro's deposition for November 9, 2022.

As before and as is our practice we are happy to reschedule this to a mutually agreeable date if this date cannot work for Ms. Ferreiro. And, as we have indicated, the City is willing to defer Ms. Ferreiro's deposition until after Ms. Chen's deposition, provided Ms. Chen's deposition occurs in the near term and by November 30. It is not acceptable, however, to delay Ms. Ferreiro's deposition indefinitely. If the parties cannot agree on a firm date in 2022 for Ms. Ferreiro's deposition, the City expects to enforce the Notice of Deposition for November 9.

**3. Ms. Chen's Claim of Privilege or Privacy.** Mr. Roberts has provided the parties with the first installment of Ms. Chen's privilege log. We have responded and set forth a process to allow the City an opportunity to review documents for privilege and responsiveness, which obviates any need for a list of the sequestered documents. Mr. Roberts will provide the parties with logs identifying any documents over which Ms. Chen has asserted privilege and/or privacy protections. After these logs are provided, and to the extent there is any non-privileged and responsive material that has been sequestered, the City will produce it to Plaintiffs. The City will perform its part expeditiously.

**4. The City's Document Production.** Both parties served initial written discovery in October 2021, and then agreed to delay serving responses until December and after each had served initial objections. At the same time the City served its responses to Plaintiffs' written discovery, it started producing documents. As Ms. Balanda explained in her April 22 correspondence, given the breadth of documents requested, the City has produced documents on a rolling basis to ensure that responsive documents are produced as quickly as possible. We also note that it was not until the April-May meet and confer process that key issues and objections were resolved such that there was clarity on the scope of documents to be produced—many documents were the subject of unresolved objections at that time, through no fault of the City. Like the



Ms. Susan B. Mindenbergs  
Mr. Jeffrey L. Needle  
October 20, 2022  
Page 3

City, Plaintiffs have produced their documents in multiple installments with the most recent sets being provided in August, or about 10 months after receipt of the discovery requests.

The City's production has not delayed Plaintiffs' ability to challenge the City's assertion of privilege. The privilege issues that are currently pending before the Court were raised by the City, in motions submitted on July 1, 2022—more than three months ago. It is not the City's fault that the motions have not been decided. Furthermore, had Plaintiffs promptly returned the City's privileged documents when first requested, these privilege issues would have been brought to the Court's attention sooner. Finally, Plaintiffs have now explained that their strategy is to challenge each and every assertion of privilege that the City makes to any documents dated August 2020 or later. Plaintiffs declined to take action on this strategy, or even to disclose it, till now, and the attempt to blame the City for these choices is unavailing.

**5. The City's Privilege Log.** The City has reviewed its privilege log and notes that there are documents that were produced in redacted form but inadvertently omitted from the log. Based on our initial review, we believe that most of these omitted documents are duplicative of documents that were logged elsewhere on the log—for example, a logged copy of the SEEC Report (COS\_000009-22) can also be found on the log at COS\_00012118-12130. The City will provide Plaintiffs with an updated log which includes these omitted documents.

If there are specific documents about which Plaintiffs challenge the City's assertion of privilege, the City is willing to meet and confer about these documents and review its redactions in light of Plaintiffs' concerns.

The City disagrees with Plaintiffs' categorical exception and/or waiver arguments that all post-August 2020 documents are not privileged.

**6. Ms. Formas's Deposition.** We are in the process of confirming our representation of Ms. Formas. Assuming we are engaged, we will follow-up with you to discuss timing and, upon agreement in that regard, accept service on her behalf. As we mentioned, Ms. Formas is late in her pregnancy, and this will impact the timing of her deposition.

**7. Ms. Durkan's Deposition.** We recognize the issues you raise with regard to service of a deposition subpoena upon Ms. Durkan. We are exploring means for service to be accepted and will be back to you in this regard as soon as we can.

Ms. Susan B. Mindenbergs  
Mr. Jeffrey L. Needle  
October 20, 2022  
Page 4

**8. Alternative Dispute Resolution.** Thank you for raising this issue. The City is amenable to ADR and aware of the deadline. We will reply further under separate cover.

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We do not agree that your October 4 correspondence is an accurate record of the parties' meet-and-confer discussions but have only addressed the inaccuracies to the extent necessary to advance the ball in resolving the pending matters.

Yours truly,

A handwritten signature in black ink, appearing to read "Sarah Gohmann Bigelow". The signature is written in a cursive, somewhat stylized script.

Sarah Gohmann Bigelow

Enclosure

cc: Mr. Darwin Roberts [[roberts@goldfarb-huck.com](mailto:roberts@goldfarb-huck.com)]

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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,  
  
Plaintiffs,  
  
v.  
  
CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,  
  
Defendant.

NO. 21-2-11739-9 SEA

**NOTICE OF VIDEOTAPED  
DEPOSITION OF KIMBERLY  
FERREIRO**

PLEASE TAKE NOTICE that, pursuant to Civil Rule 30, the deposition of Kimberly Ferreiro will be taken on oral examination before a notary public, or other official authorized by law to administer oaths, via Zoom video conferencing, commencing at 9:30 a.m. PDT on November 9, 2022, at the offices of Savitt Bruce & Willey LLP, 1425 Fourth Avenue Suite 800, Seattle, Washington 98101. This deposition will be recorded by stenographic means and will also be video recorded. It will be subject to continuance from time to time until completed.

This deposition will be conducted by remote video means<sup>1</sup> using a Zoom link to be provided at least five days in advance of the time for the deposition set forth above. Should

<sup>1</sup> “There is a presumption that depositions shall occur via remote means unless good cause is shown.” <https://kingcounty.gov/~media/courts/superior-court/docs/COVID-19/Civil-C19.ashx?la=en>. The noticing party is amenable to in person deposition at the location noted herein if the deponent wishes.

1 any participant have trouble accessing the Zoom link, please contact Sarah Gohmann Bigelow  
2 or James Savitt at 206-749-0500.

3  
4 DATED: October 20, 2022.

5 **SAVITT BRUCE & WILLEY LLP**

6  
7 By s/James P. Savitt

8 James P. Savitt, WSBA #16847

9 Sarah Gohmann Bigelow, WSBA #43634

10 1425 Fourth Avenue Suite 800

11 Seattle, Washington 98101-2272

12 Telephone: 206.749.0500

13 Facsimile: 206.749.0600

14 Email: [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)

15 Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

16  
17 *Attorneys for Defendant City of Seattle*

1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
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20 *Attorney for Plaintiffs*

21 DATED this 20th day of October, 2022 at Seattle, Washington.

22   
Meghan Parker

# **EXHIBIT D**

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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,  
  
Plaintiffs,  
  
v.  
  
CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,  
  
Defendant.

NO. 21-2-11739-9 SEA  
  
**CITY OF SEATTLE’S DISCLOSURE  
OF POSSIBLE PRIMARY  
WITNESSES**

Pursuant to LCR 26(k)(1) and the March 16, 2022 Stipulation and Order Continuing Trial Date and Amending Case Schedule, Defendant City of Seattle (the “City”) submits the following list of possible primary witnesses. This list is based on the City’s current knowledge of the facts, events, claims, and defenses at issue. The listing of a name on this list is not an admission or acknowledgement by the City that the person in fact has relevant or discoverable information. The City reserves all objections concerning the production, testimony, or scope of inquiry to be had of any witness.

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## I. LAY WITNESSES

The City identifies the lay witnesses listed below whom it reserves the option to call as witnesses at trial. The City reserves the right to amend and/or supplement this disclosure to include additional information or witnesses.

1. **Wayne Barnett**—c/o Savitt Bruce & Willey LLP, 1425 Fourth Avenue Suite 800, Seattle, Washington 98101; (206) 749-0500 (herein “SBW”). Mr. Barnett is the Executive Director for the Seattle Ethics and Elections Commission (“SEEC”). Mr. Barnett has knowledge regarding the March 4, 2021 whistleblower complaint (Case No. 21-WBI-0304-1) (the “Whistleblower Complaint”), the City’s response to the Whistleblower Complaint including without limitation the SEEC’s report issued in response, and related matters.

2. **Lyle Canceko**—1520 NE 85th Street, Seattle, Washington 98115; (206) 818-8967. Mr. Canceko is a former office administrator for the Mayor’s Office. Mr. Canceko is likely to have knowledge regarding Plaintiffs’ performance of their duties and issues concerning the supervision of their work, the plan to reorganize the public disclosure positions at the Mayor’s Office, and related matters. He may also have other information pertinent to this lawsuit.

3. **Michelle Chen**—c/o Darwin Roberts, Goldfarb & Huck PLLC, 925 Fourth Avenue, Suite 3950, Seattle, Washington, 98104. Ms. Chen is former legal counsel to the Mayor’s Office. Ms. Chen has knowledge regarding Plaintiffs’ performance of their duties and issues concerning the supervision of their work, the reorganization of the public disclosure positions at the Mayor’s Office, the events described in the Whistleblower Complaint and the SEEC’s report issued in response, actions taken by the City in response to the Whistleblower Complaint and SEEC report, and related matters. She may also have other information pertinent to this lawsuit.

4. **Jenny Durkan**. Former Mayor Durkan has knowledge regarding the City’s response to the SEEC’s Report, and related matters. She may also have other information pertinent to this lawsuit.



1           5.       **Kimberly Ferreiro**—c/o Mr. Jeffrey L. Needle and Ms. Susan B. Mindenbergs,  
2 Law Office of Jeffrey L. Needle, Law Office of Susan B. Mindenbergs, 705 Second Avenue,  
3 Suite 1050, Seattle, Washington 98104 (herein, “Plaintiffs’ Counsel”). Ms. Ferreiro is a  
4 plaintiff in this case and has information regarding Plaintiffs’ allegations and the City’s  
5 defenses.

6           6.       **Michael Fong**—3136 NE 82nd Street, Seattle, Washington 98115; (206) 779-  
7 1070. Mr. Fong is a former Senior Deputy Mayor. Mr. Fong has knowledge regarding  
8 Plaintiffs’ performance of their duties and issues concerning the supervision of their work, the  
9 reorganization of the public disclosure positions at the Mayor’s Office, actions taken by the  
10 City in response to the Whistleblower Complaint and the SEEC’s Report issued in response,  
11 and related matters. He may also have other information pertinent to this lawsuit.

12           7.       **Stephanie Formas**—4251 South Juneau Street, Seattle, Washington 98118;  
13 (214) 674-7709. Ms. Formas is former Chief of Staff at the Mayor’s Office. Ms. Formas has  
14 knowledge regarding Plaintiffs’ performance of their duties, actions taken by the City in  
15 response to the Whistleblower Complaint and the SEEC’s report issued in response including  
16 but not limited to efforts to offer Ms. Irwin an appropriate position, and related matters. She  
17 may also have other information pertinent to this lawsuit.

18           8.       **Stacy Irwin**—c/o Plaintiffs’ counsel. Ms. Irwin is a plaintiff in this case and  
19 has information regarding Plaintiffs’ allegations and the City’s defenses.

20           9.       **Camille Jones**—Ms. Jones is believed to reside on Vancouver Island in British  
21 Columbia, Canada. Her last known address is 13011 3<sup>rd</sup> Ave NW, Seattle, Washington 98177;  
22 (206) 714-5469. Ms. Jones is a former Employee Relations Manager at the City’s Department  
23 of Human Resources. Ms. Jones has knowledge regarding Plaintiffs’ performance of their  
24 duties and issues concerning the supervision of their work, the reorganization of the public  
25 disclosure positions at the Mayor’s Office, actions taken by the City in response to the  
26 Whistleblower Complaint and SEEC report including but not limited to efforts to offer Ms.

1 Irwin an appropriate position, and related matters. She may also have other information  
2 pertinent to this lawsuit.

3 10. **Julie Kipp**—c/o SBW. Ms. Kipp is the Citywide Public Disclosure Manager.  
4 Ms. Kipp may have knowledge regarding Plaintiffs’ job performance and the City’s response to  
5 the Whistleblower Complaint and the SEEC’s report issued in response. She may also have  
6 other information pertinent to this lawsuit.

7 11. **Nana Mendez**—c/o SBW. Ms. Mendez is a Director of Human Resources for  
8 the City. Ms. Mendez may have knowledge regarding Plaintiffs’ performance of their duties  
9 and issues concerning the supervision of their work, the City’s response to the Whistleblower  
10 Complaint and the SEEC’s report issued in response, Plaintiffs’ payroll, personnel, and other  
11 City HR-related records and matters as relevant, and related matters. She may also have other  
12 information pertinent to this lawsuit.

13 12. **Other Current or Former Employees and/or Representatives of the City of**  
14 **Seattle.** These individuals have not yet been identified and thus their contact information is not  
15 yet known; the City will supplement this disclosure as necessary. It is anticipated that these  
16 witnesses could have knowledge regarding the Plaintiffs’ performance of their duties, issues  
17 concerning the supervision of Plaintiffs’ work, the allegations set forth in the Whistleblower  
18 Complaint and the SEEC’s findings as set forth in its report, the City’s response to the  
19 Whistleblower Complaint and SEEC’s report issued in response including but not limited to  
20 efforts to offer Ms. Irwin an appropriate position, Plaintiffs’ claims that they were  
21 constructively discharged and or retaliated against and the City’s defenses, and may have other  
22 information pertinent to this lawsuit.

23 13. **Individuals Identified in Plaintiffs’ Written Discovery Responses.** The City  
24 reserves the right to call as a witness any person identified by Plaintiffs in their written  
25 discovery responses including but not limited to the individuals identified by Ms. Ferreiro in  
26 response to Interrogatory Numbers 1 and 18 and Ms. Irwin in response to Interrogatory  
27 Numbers 1 and 17.

1 **II. EXPERT WITNESSES**

2 The City may have expert(s) testify and/or lay witnesses provide expert testimony with  
3 respect to the matters relevant to the claims and defenses asserted in this lawsuit. The expert(s)  
4 on such subject matters have not yet been identified and/or retained. The City reserves its right  
5 to amend and/or supplement this disclosure.

6 **III. RESERVATION OF RIGHTS**

7 The City reserves the right (a) to call as a witness any person identified as a possible  
8 witness by Plaintiffs in this action; (b) to identify and disclose additional lay and/or expert  
9 witnesses in response to Plaintiffs’ witness disclosures or otherwise; (c) to call records  
10 custodians, as necessary, to establish the authenticity or admissibility of any documents at  
11 issue; and (d) to supplement this disclosure and identify as a witness any person the identity or  
12 relevance of whom is not presently known but is disclosed or becomes apparent during the  
13 course of discovery, which is ongoing.

14  
15 DATED: October 24, 2022.

16 **SAVITT BRUCE & WILLEY LLP**

17  
18 By s/ Sarah Gohmann Bigelow

19 James P. Savitt, WSBA #16847  
20 Brandi B. Balanda, WSBA #48836  
21 Sarah Gohmann Bigelow, WSBA #43634  
22 1425 Fourth Avenue Suite 800  
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27 Email: [bbalanda@sbwLLP.com](mailto:bbalanda@sbwLLP.com)  
Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

*Attorneys for Defendant City of Seattle*

1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
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- Via Legal Messenger
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- Via Fax

20 *Attorney for Plaintiffs*

21 DATED this 24<sup>th</sup> day of October, 2022 at Seattle, Washington.

22   
Meghan Parker

# **EXHIBIT E**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

STACY IRWIN and KIMBERLY FERREIRO,

Plaintiffs,

v.

CITY OF SEATTLE, WASHINGTON, a  
municipal corporation under the laws of the  
State of Washington,

Defendant.

Case No. 21-2-11739-9 SEA

**PLAINTIFFS' DISCLOSURE OF  
POSSIBLE PRIMARY  
WITNESSES**

COMES NOW the Plaintiff pursuant to King County LCR 26 and designates the  
following witnesses as primary witnesses in the above referenced case:

1. Wayne Barnett, Executive Director of the Seattle Ethics & Elections Commission, c/o  
Savitt Bruce & Willey, LLP, (206) 749-0500. Barnett has knowledge of the Plaintiffs'  
whistleblower complaint, the investigation into those complaints, and the results of that  
investigation.

2. Kristi Bronemann, Address and Phone Number to be Supplemented. Bronemann is  
Plaintiff Irwin's friend and has knowledge of Plaintiff's emotional distress resulting from the

1 hostile work environment, being forced to commit illegal acts in violation of the Public Records  
2 Act, and her constructive discharge from employment.

3           3. Angie Bronson, Executive Assistant to Policy Office and Legal Counsel, Address and  
4 Phone Number to be Supplemented. Bronson has personal knowledge of City of Seattle's  
5 communications with Chen concerning the interpretation of the PRA, Chen's direction to  
6 Plaintiffs to alter public records, and the abuse and scorn Chen subjected Plaintiffs to in meetings  
7 relating to the missing text messages. Bronson personally observed Chen giving Plaintiffs  
8 directions that violated the Public Records Act and Chen's abusive reaction to Plaintiffs'  
9 resistance.  
10

11           4. Michelle Chen, c/o Darwin Roberts, Goldfarb & Huck, Roth, Riojas PLLC, (206) 794-  
12 7716. Ms. Chen is the former General Counsel to Mayor Durkan and has knowledge of the  
13 claims alleged in the Complaint.  
14

15           5. Former Mayor Jenny Durkan, Address and Phone Number to be Supplemented. Ms.  
16 Durkan has knowledge about the missing text messages and the efforts made by the City to  
17 obfuscate the fact the text messages were missing by narrowing the scope of the public records  
18 requests made involving text messages and recreating the text messages to make it appear that  
19 they came from the Mayor.  
20

21           6. Garrett Ferreiro, 54 Folly Field Road, Hilton Head, South Carolina 29928. (206) 351-  
22 8665. Ferreiro is Plaintiff's husband and has knowledge of her emotional distress resulting from  
23 the hostile work environment, being forced to commit illegal acts in violation of the Public  
24 Records Act, and her constructive discharge from employment.

25           7. Kimberly Ferreiro, c/o Plaintiffs' Counsel. Ferreiro is co-Plaintiff and has personal  
26 knowledge of the history of Chen's abuse and hostility, retaliation, and the demand to perform

1 illegal acts which created a hostile work environment leading to her own and Plaintiff Irwin's  
2 constructive discharges from employment with the Defendant.

3 8. Michael Fong, former Seattle Deputy Mayor, 3136 NE 82nd Street, Seattle,  
4 Washington 98115, Phone Number to be Supplemented. Fong was Chen's supervisor and has  
5 personal knowledge about Plaintiffs' complaints about being instructed to recreate the Mayor's  
6 missing text messages, interpret the PRA requests narrowly to exclude the Mayor's missing text  
7 messages, and instruction to deceive the PRA requesters about whether the Mayor's text  
8 messages had been deleted.  
9

10 9. Andrea Friedhoff, former Director of Office Administration and Scheduling, Address  
11 and Phone Number to be Supplemented. Ms. Friedhoff has personal knowledge of Plaintiffs'  
12 meetings with Deputy Mayor Fong.  
13

14 10. Stephanie Formas, former Chief of Staff, Mayor Durkan's Office, 4251 S Juneau  
15 Street, Seattle, WA 98118, Phone Number to be Supplemented. Formas has knowledge about  
16 Plaintiffs' complaints about the violations of the Public Records Act.

17 11. Denise Hall, Address and Phone Number to be Supplemented, is Plaintiff Irwin's  
18 friend and has knowledge of Plaintiff's emotional distress and pain and suffering resulting being  
19 forced to commit illegal acts in violation of the Public Records Act, and her constructive  
20 discharge from employment.  
21

22 12. Rene Irwin, Address and Phone Number to be Supplemented, is Plaintiff's mother  
23 and has knowledge of Plaintiff's emotional distress and pain and suffering being forced to  
24 commit illegal acts in violation of the Public Records Act, and her constructive discharge from  
25 employment.  
26



1 13. Shellie Irwin, Address and Phone Number to be Supplemented, is Plaintiff's sister  
2 and has knowledge of Plaintiff's emotional distress and pain and suffering resulting being forced  
3 to commit illegal acts in violation of the Public Records Act, and her constructive discharge from  
4 employment.

5 14. Stacy Irwin, c/o Plaintiffs' Counsel. Irwin is co-Plaintiff and has personal knowledge  
6 of the history of Chen's abuse and hostility, retaliation, and the demand to perform illegal acts  
7 which created a hostile work environment leading to her own and Plaintiff Ferreiro's  
8 constructive discharges from employment with the Defendant.

9 15. Camille Jones, Human Resources, c/o Savitt Bruce & Willey, LLP, (206) 749-0500.  
10 Jones has knowledge of Plaintiffs work-related complaints about Michelle Chen, the hostile  
11 work environment, the City's lack of response to complaints about Chen's behavior, the  
12 allegations in the Complaint, and mitigation of damages.

13 16. Amarah Khan, Director for the City's Office of the Ombud, c/o Savitt Bruce &  
14 Willey, LLP, (206) 749-0500. Dr. Khan has personal knowledge of her meetings with Plaintiffs  
15 and Michelle Chen and the hostile work environment Chen created.

16 17. Jennene Licata, Address and Phone Number to be Supplemented, is Plaintiff's friend  
17 and has knowledge of Plaintiff's emotional distress and pain and suffering resulting being forced  
18 to commit illegal acts in violation of the Public Records Act, and her constructive discharge from  
19 employment.

20 18. Charles Meredith, M.D., Psychiatric Medicine Associates, 1505 Westlake Ave N.,  
21 #920, Seattle WA, 98109, 206) 386-3103, expert witness, has knowledge of Plaintiff Ferreiro's  
22 emotional distress, causation, and her prognosis.

1 19. Eldrid Joy Perez Milambiling, MD, Kaiser Permanente Downtown Seattle Medical  
2 Center, 1420 5th Ave Ste 375, Seattle, WA, 98101, (206) 223-2611. Dr. Milambiling is Plaintiff  
3 Irwin's treating physician and has knowledge of her constructive discharge and emotional  
4 distress damages.

5 20. Jessica Nadelman, City Attorney's Office, c/o Savitt Bruce & Willey, LLP, (206)  
6 749-0500. Plaintiffs confided in Nadelman about the violations of the Public Records Act  
7 directed by Chen and the hostile work environment Chen created when Plaintiffs resisted.  
8

9 21. Dr. James Benn, ARPN, Beaufort County Memorial Hospital, 989 Ribaut Road Suite  
10 330, Beaufort, South Carolina, 29902-5426, (843) 522-5600. Dr. Benn is Plaintiff Ferreiro's  
11 treating physician and has knowledge of her constructive discharge and emotional distress  
12 damages.  
13

14 22. Ramsey Ramerman, Special Counsel to the SEEC Director, 1111 3rd Ave, Seattle,  
15 WA 98101, (206) 447-4674. Ramerman has knowledge of the Whistleblower Complaint, the  
16 investigation into those complaints, and the results of that investigation.

17 23. Aaron Valla, c/o Savitt Bruce & Willey, LLP, (206) 749-0500. Plaintiffs informed  
18 Valla about the violations of the Public Records Act directed by Chen and the hostility Chen  
19 created when Plaintiffs resisted.  
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21 24. Plaintiff reserves the right to call any witness designated by the Defendants.

22 25. Plaintiff reserves the right to call additional witnesses as they become known in  
23 discovery.  
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Dated this 24<sup>th</sup> day of October 2022.

LAW OFFICE OF JEFFREY L. NEEDLE

/s/ Jeffrey Needle  
Jeffrey L. Needle, WSBA No. 6346  
Susan B. Mindenbergs, WSBA #20545  
Attorneys for Plaintiffs

1 **DECLARATION OF SERVICE**

2 I, Lonnie Lopez, certify and declare that I am now and at all times herein mentioned was  
3 a citizen of the United States and resident of the State of Washington, over the age of eighteen  
4 years, not a party to the above-entitled action, and am competent to testify as a witness. I am a  
5 Paralegal employed with the Law Offices of Jeffrey Needle. On October 24, 2022, I served the  
6 within document(s) on the following in the manner indicated below:  
7

8 • Plaintiff’s Disclosure of Possible Primary Witnesses

9 James P. Savitt, WSBA #16847  
10 Brandi B. Balanda, WSBA #48836  
11 Sarah Gohmann Bigelow, WSBA #43634  
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13 Seattle, Washington 98101-2272  
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18 Email: sgohmannbigelow@sbwLLP.com

- Via Legal Messenger
- Via Facsimile
- X** Via Electronic Mail
- Via U.S. Mail
- Via Electronic Filing/Eservice

19 Attorneys for Defendant City of Seattle

20 The foregoing statement is made under the penalty of perjury under the laws of the State  
21 of Washington that the foregoing is true and correct.

22 Dated: October 24, 2022

23 /s/ Lonnie Lopez  
24 Lonnie Lopez, Paralegal

# **EXHIBIT F**

No. 84843-7-I

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**COURT OF APPEALS, DIVISION I  
OF THE STATE OF WASHINGTON**

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STACY IRWIN and KIMBERLY FERREIRO,

*Petitioners,*

v.

CITY OF SEATTLE, WASHINGTON,

*Respondent.*

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PETITIONERS' MOTION TO STAY PROCEEDINGS

---

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*Attorneys for Petitioners*

## TABLE OF CONTENTS

I. IDENTITY OF PLAINTIFFS.....	1
II. STATEMENT OF RELIEF SOUGHT.....	1
III. STATEMENT OF ISSUES.....	3
IV. FACTS RELEVANT TO MOTION.....	4
A. Plaintiffs Objected to Violations of the Public Records Act.....	4
B. Plaintiff’s Whistleblower Complaint is Sustained.....	6
C. The Trial Court Ruled that Documents Retained by Plaintiffs to Support the Whistleblower Complaint Were Either Attorney-Client Privileged or Work Product.....	8
D. The Trial Court Denied Plaintiffs’ Motion for an <i>in camera</i> Review.....	9
E. The Trial Court Granted the Defendant’s Motion to Compel Ms. Ferreiro’s deposition.....	9
V. GROUNDS FOR RELIEF AND ARGUMENT.....	10
A. The Standard for Review to Grant a Motion to Stay Proceedings.....	10
B. There are Debatable Issues on Appeal.....	13

1. The attorney-client privilege is narrowly construed because privileges impede the search for the truth.....	14
2. Whether the civil fraud exception applies to the Defendant’s claims of attorney-client privilege is at least debatable.....	15
3. Whether Plaintiffs’ protected activity falls within the attorney-client privilege is debatable.....	16
4. Whether the attorney-client privilege has been waived by the Defendant’s voluntary disclosure is debatable.....	19
5. Whether the work product doctrine applies is Debatable.....	21
a. Documents prepared in anticipation of litigation.....	21
b. Trial preparation materials.....	23
6. Whether the trial court erred in denying Plaintiff’s motion for an <i>in camera</i> review is debatable.....	24
7. Whether the Trial Court Erred in Compelling Ferreiro’s Deposition is Debatable.....	25
C. The Injury that Plaintiffs Would Suffer if a Stay is Denied Would Be Extreme While the Injury that Would Be Suffered by the Defendant If the Stay is Granted Would Be <i>De Minimis</i> .....	26



D. The Court Should Dispense with a Bond, Cash, or Other Security.....	28
VI. CONCLUSION.....	28

## **I. IDENTITY OF PETITIONERS**

Stacy Irwin and Kimberly Ferreiro are the Petitioners filing this Motion (hereinafter “Plaintiffs”).

## **II. STATEMENT OF RELIEF SOUGHT**

Plaintiffs seek a stay of all trial court proceedings until 30 days after the final resolution of the Motion for Discretionary Review filed on January 18, 2023.

Plaintiffs Stacy Irwin and Kimberly Ferreiro are former employees of the City of Seattle who were employed as public records officers assigned to the Mayor’s office and charged with responding to public records requests pursuant to the Public Records Act (“PRA”), RCW 42.56 *et seq.* Plaintiffs filed suit against the City of Seattle on September 3, 2021. DKT 1. In relevant part, Plaintiffs allege they were constructively discharged from employment in retaliation for objecting to the City’s unlawful instructions to violate the PRA.

Without explanation, the trial court has overruled virtually all of Plaintiffs’ objections to the Defendant’s assertion of the

attorney-client privilege and work product. This ruling includes approximately 163 pages of documents. Plaintiffs also appeal from the denial of their motion for *in camera* review of 577 pages of additional documents reflected on a 46-page privilege log produced on October 21, 2022. Plaintiffs also appeal the trial court's order compelling the deposition of Ferreiro (and awarding attorney fees) scheduled for January 30, 2023. The trial court's ruling on these issues constitutes obvious or probable error. At the very least, all of these issues are debatable. The injury that Plaintiffs would suffer if a stay is not imposed would be extreme while the injury that would be suffered by the Defendant if the stay is granted is *de minimis*.

The Defendant's motion to continue the trial date was recently granted and has been recently rescheduled for June 12, 2023. The discovery cut-off date is April 24, 2023. DKT 104. Plaintiffs requested a date in January 2024. Plaintiffs have called the Court of Appeals and learned the earliest date their Motion for Discretionary Review could be heard is April 7, 2023.

Plaintiffs require the depositions of City of Seattle officials who instructed or participated in the decision to instruct Plaintiffs to violate the PRA. If this motion to stay is denied, Plaintiffs will be unable to depose those witnesses with the benefit of unprivileged information. Plaintiffs will lose the fruits of their appeal because even if they win the discovery cut-off will have expired before the Motion for Discretionary Review can be resolved. Indeed, if Plaintiffs' arguments on appeal are sustained, they likely won't have access to information redacted by Defendant before trial.

### **III. STATEMENT OF ISSUES**

1. Are the merits of Plaintiffs' objections to the trial court determination of privilege, its denial of Plaintiffs' motion for an *in camera* review, and the order compelling Ferreiro's deposition debatable?
2. Will Plaintiffs be denied the fruits of their appeal if the motion to stay is denied?

//

//

#### **IV. FACTS RELEVANT TO MOTION**

##### **A. Plaintiffs Objected to Violations of the Public Records Act.**

Stacy Irwin and Kimberly Ferreiro were public records officers assigned to work in the office of former Mayor Jenny Durkan. They are both certified by the Washington Association of Public Records Officers. SP001. In June 2020, in the wake of the murder of George Floyd, the City of Seattle experienced numerous protests. A six-block zone known as CHAZ (Capitol Hill Autonomous Zone) or CHOP (Capitol Hill Organized Protest) encompassing the East Precinct was occupied by protestors for three weeks in June 2020 in the Capitol Hill neighborhood of Seattle. During the Seattle protests, City of Seattle officials abandoned the Seattle Police Department East Precinct.

Approximately 48 public records requests were made by the media and members of the public many of which were seeking information about the decision to abandon the East

Precinct. SP001. The records requests sought communications including text messages sent or received by Mayor Durkan for the timeframe during which the abandoned precinct and occupation of the surrounding city blocks occurred. In August 2020, it was learned that nine months of Mayor Durkan's text messages from August 28, 2019 to until June 25, 2020 were either intentionally or unintentionally deleted. *Id.*

In August 2020, Irwin and Ferreiro worked in Mayor Durkan's office reporting to Michelle Chen, Mayor Durkan's legal counsel. SP002. Chen directed Irwin and Ferreiro about how to respond to public records requests seeking Mayor Durkan's missing text messages. SP003.

Chen directed Irwin and Ferreiro to violate the PRA in order to deceive PRA requestors that the Mayor's text messages for the relevant time period were missing. SP002. In particular, Irwin and Ferreiro were instructed to narrowly construe the PRA requests so that the Mayor's text messages would only be responsive if explicitly requested, and to recreate the text

messages to make them appear that they were sent by the Mayor's phone when they actually had been sent by a different City official. SP003-004. Plaintiffs, who had years of experience responding to public records requests, repeatedly advised Chen that her direction on public records requests seeking the Mayor's text messages violated the PRA. Ferreiro objected saying, "[m]y suggestion has always been that we tell the truth." SP0032.

**B. Plaintiff's Whistleblower Complaint is Sustained.**

After their objections were ignored, Plaintiff Irwin filed a formal whistleblower complaint with the Seattle Ethics and Election Commission ("SEEC") alleging the City violated the PRA. On May 6, 2021, SEEC Executive Director Wayne Barnett issued an investigative report. SP001. Significant portions of the investigative report are redacted. The unredacted portions of the investigative report in relevant part concluded that the "decision to narrowly interpret the majority of 48 pending PRA requests . . . so those requests were not requesting the Mayor's text messages violated the PRA's statutory mandate to provide

‘adequate responses’ to PRA requests.” “This decision . . . was a violation of the PRA and qualifies as improper governmental action.” SP002. The investigative report also concluded that the decision “not to inform requesters that the Mayor’s text messages had been lost and the Respondent was producing an incomplete set of recreated texts messages violated ‘best practices’ for responding to the PRA requests but did not necessarily violate the letter of the law.” SP0012. The SEEC investigative report stated: “The records reviewed during this investigation show that Irwin and Ferreiro were knowledgeable public records officers who strived to follow best practices when responding to PRA requests.” SP0012.

Mayor Jenny Durkan, in a response required by Seattle Municipal Code 4.20.830(E), admitted the City’s wrongdoing. Mayor Durkan stated: “I also agree that the underlying actions fell short of the obligations under the PRA. Indeed, no government should be looking to narrowly apply the law. Absent a specific and needed exemption, the presumption should be in



favor of production.” SP0036.

**C. The Trial Court Ruled that Documents Retained by Plaintiffs to Support the Whistleblower Complaint Were Either Attorney-Client Privileged or Work Product.**

In July 2022, the City moved for an *in camera* review and determination of privilege of approximately 163 pages of documents that Plaintiffs had in their possession and over which the Defendant claimed attorney-client privilege or work product. DKT 18. The documents consisted largely of emails between Plaintiffs and their attorney supervisor Chen about PRA requests and Chen’s response to those PRA requests. Most of the documents retained by Irwin and Ferreiro were those submitted to the SEEC in support of Plaintiff Irwin’s March 2021 whistleblower complaint. Defendant heavily redacted these documents and asked the trial court to order Plaintiffs to disgorge any unredacted copies.

The trial court, without explanation, found the overwhelming majority of documents retained by Plaintiffs and submitted *in camera* by the Defendant to be protected by

attorney-client privilege or the work product doctrine. The trial court found three documents were not protected and two additional documents were found to be privileged, in part. SP0014-0020. Plaintiffs' Motion for Reconsideration was denied on December 2, 2022. SP0021-0022. On January 3, 2023, Plaintiffs filed a Notice of Discretionary Review.

**D. The Trial Court Denied Plaintiffs' Motion for an *in camera* Review.**

On November 18, 2022, Plaintiffs moved for an *in camera* review of 577 additional documents reflected on Defendant's 46-page privilege log produced on October 21, 2022. SP0041. On January 6, 2023, the trial court, without explanation, denied Plaintiffs' motion for an *in camera* review. SP0023. Plaintiffs have amended their motion for discretionary review to include the trial court's denial of an *in camera* review. See RAP 5.3(h)(ii).

**E. The Trial Court Granted the Defendant's Motion to Compel Plaintiff Ferreiro's Deposition.**

On November 18, 2022, the Defendant moved to compel

the deposition of Plaintiff, Ferreiro. DKT 67. Plaintiffs objected and argued that the deposition should be delayed until after the resolution of outstanding attorney-client privilege and work product issues raised by Plaintiffs' pending motion for an *in camera* review. DKT 80. On January 6, 2023, the trial court granted the Defendant's motion to compel and awarded attorney fees. SP0027-0031. Ferreiro's deposition is now scheduled for January 30, 2023.

## **V. GROUNDS FOR RELIEF AND ARGUMENT**

### **A. The Standard for Review to Grant a Motion to Stay Proceedings.**

In relevant part, the Rule 8.1(b) of the Rules of Appellate Procedure provide that “[A] trial court decision may be enforced pending appeal or review unless stayed pursuant to the provisions of this rule. . . . Stay of a decision in other civil cases is a matter of discretion.” RAP 8.1(b)(3) addresses “other civil cases” and in relevant provides:

**Other Civil Cases.** In evaluating whether to stay enforcement of such a decision, the appellate

court will (i) consider whether the moving party can demonstrate that debatable issues are presented on appeal and (ii) compare the injury that would be suffered by the moving party if a stay were not imposed with the injury that would be suffered by the nonmoving party if a stay were imposed.

Rule 8.3 of the Rules of Appellate Procedure likewise authorizes the appellate court “to issue orders before or after acceptance of review . . . to insure effective and equitable review, including authority to grant injunctive or other relief to a party.”

“The court has inherent power to stay its proceedings where the interest of justice so requires.” *King v. Olympic Pipeline Co.*, 104 Wash. App. 338, 348-50, 16 P. 3d 45 (2000). “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Id. See also Moreman v. Butcher*, 126 Wn.2d 36, 43 n6, 891 B.2d 725 (1995) (“RAP 8.1(b)(3) and RAP 8.3 give appellate courts discretion to stay the enforcement of trial court decisions”). “The purpose of the above rule [RAP

8.1(b)(3)] is to permit appellate courts to grant preliminary relief in aid of their appellate jurisdiction so as to prevent destruction of the fruits of a successful appeal.” *Wash. Fed'n of State Emps. v. State*, 99 Wash.2d 878, 883, 665 P.2d 1337 (1983). *See also Johnson v. Inslee*, 198 Wn.2d 492, 496 P.3d 1191 (2021) (“The purpose of this rule is to provide appellate courts with authority to provide preliminary relief so as to preserve the fruits of a successful appeal”); *Cronin v. Central Valley School District*, 3 Wn. App. 2d \_\_\_, \_\_\_, 456 P.3d 857, 861 (2020) (published in part) (“Although briefing and argument is expedited in these sorts of matters, the process does not allow for an immediate resolution. The ultimate resolution can be further delayed if a party moves to modify a court commissioner's decision. Depending on the nature of the rights in play, it can take weeks or months for this process to conclude. This delay in staying some orders can impair the fruits of a successful appeal”).

RAP 8.1(b)(3) requires the court commissioner to "(i) consider whether the moving party can demonstrate that

debatable issues are presented on appeal and (ii) compare the injury that would be suffered by the moving party if a stay were not imposed with the injury that would be suffered by the nonmoving party if a stay were imposed." *Herrera v. Villaneda*, 3 Wn. App. 2d. 483, 492, 416 P. 3d 733 (2018). *See also Garfield County v. State*, Order on Emergency Motion to Stay, No. 97914-6 (2019) ("We believe a stay is justified because the State has demonstrated that the issues presented are debatable and that the harms it will suffer absent a stay outweigh the financial injuries I-976's challengers will face with a stay.").

**B. There are Debatable Issues on Appeal.**

Plaintiffs assert four objections to the application of the attorney-client privilege and work product doctrine: 1) the civil fraud exception to attorney-client privilege; 2) that communications relating to plaintiffs' protected activity are not covered by the attorney-client privilege; 3) waiver of the privilege by voluntary disclosure, and 4) the inapplicability of the work product exceptions. These objections applied to the trial

court's determination of privilege relating to 163 pages of documents retained by Plaintiffs, DKT 28, and Plaintiffs' denied motion for an *in camera* review of 577 pages reflected on the Defendant's 46-page privilege log. DKT 67.

**1. The attorney-client privilege is narrowly construed because privileges impede the search for the truth.**

The party asserting the attorney-client privilege has the burden of proving that it applies. *VersusLaw, Inc. v. Stoel Rives, LLP*, 127 Wn. App. 309, 332, 111 P.3d 866 (2005); *R.A. Hanson v. Magnuson*, 79 Wn. App. 497, 501, 903 P.2d 496 (1995) *review denied*, 129 Wn.2d 1010, 917 P.2d 130 (1993). "Statutes establishing evidentiary privileges must be construed narrowly because privileges impede the search for the truth." *VersusLaw, Inc.*, 127 Wn. App. at 332. "Because the privilege sometimes results in the exclusion of evidence, which is otherwise relevant and material, contrary to the philosophy that justice can be achieved only with the fullest disclosure of the facts, the privilege cannot be treated as absolute; rather, it must be strictly

limited to the purpose for which it exists.” *Dike v. Dike*, 75 Wn.2d 1, 11, 448 P.2d 490 (1968). *See also Newman v. Highland School Dist. No. 203*, 186 Wn.2d 679, 778, 381 P. 3d 1188 (2016) (same).

**2. Whether the civil fraud exception applies to the Defendant’s claims of attorney-client privilege is debatable.**

The attorney-client privilege is pierced by the fraud exception. *Cedell v. Farmers Ins. Co. of Washington*, 176 Wn.2d 686, 295 P.3d 239, 245 (2013). It is well established that “communications that otherwise would be protected by the attorney-client privilege or attorney work product privilege are not protected if they relate to client communications in furtherance of contemplated or ongoing criminal or fraudulent conduct.” *In re Grand Jury Subpoena Duces Tecum*, 731 F.2d 1032, 1038 (2d Cir. 1984). If the advice was sought in furtherance of a fraud that is not necessarily a violation of the criminal code, the communication is nonetheless unprivileged. *Clark v. U.S.*, 289 U.S. 1, 13-14 (1933). In order to pierce the



attorney-client privilege Plaintiffs need to prove a *prima facie* case of a civil claim for fraud. *See Barry v. USAA*, 98 Wn. App. 199, 989 P.2d 1172, 1175 (1999).

Here, documentation demonstrates that Chen directed Plaintiffs to recreate text messages from other city officials' phones to make them appear as though they were messages from the Mayor's phone when those messages had actually been deleted. The trial court has ruled that many of these communications are protected by the attorney-client privilege.

This attempt at intentional deception is both a violation of the PRA and fraud. There is neither evidence nor argument to contrary. The trial court committed probable or obvious error by upholding Defendant's claim of attorney-client privilege. Whether the civil fraud exception applies is debatable thereby justifying a stay of proceedings.

**3. Whether Plaintiffs' protected activity falls within the attorney-client privilege is debatable.**

Washington employees who are terminated from

employment for having objected to the violation of clear mandate of public policy state a cause of action for wrongful discharge. *Thompson v St. Regis Paper Co.*, 102 Wn.2d 219, 685 P.2d 1081 (1984); WPI 330.50. Likewise, employees are protected if they have a reasonable belief that the public policy is violated. WPI 330.51. Here, it is not debatable that the PRA is a clear mandate of public policy. The SEEC investigative report and the admission of Mayor Durkan clearly establish that the PRA was violated when Plaintiffs were required to narrowly construe PRA requests. Although the investigative report found the instruction to recreate the text messages violated PRA “best practices, Plaintiffs reasonably believed that was also a violation of the PRA.

The Mayor’s counsel, Michelle Chen, and other City officials’ instructions to narrowly construe the text messages and recreate them constitutes Plaintiffs’ protected activity. Plaintiffs’ objections to those instructions are also protected activity. Without sufficient proof of that protected activity, Plaintiffs

cannot succeed in their claim of wrongful discharge. Yet the Defendants argued and the trial court apparently ruled that when communications to perform an illegal act come from an attorney those communications are protected by the attorney-client privilege.

The attorney-client privilege is to be construed narrowly. *VersusLaw, Inc.*, 127 Wn. App. at 332. The trial court's broad application of the attorney-client privilege is unsupported by anything in Washington law and is contrary to "the public interest in full disclosure of all the facts." *Dike v. Dike*, 75 Wn.2d 1, 11, 448 P.2d 490 (1968). See also *Newman v. Highland School Dist. No. 203*, 186 Wn.2d 679, 778, 381 P. 3d 1188 (2016) (same). The attorney-client privilege is not absolute. Rather, it is limited to the purpose for which it exists. *Dietz*, 131 Wn.2d at 843 (citing *Dike*, 75 Wn.2d at 11). "Its [the attorney client privilege] ultimate application requires a balancing of the benefits of the privilege against the public interest of a full revelation of all the facts." *State v. Bonds*, 98 Wn.2d 1, 21, 653

P.2d 1024 (1982).

The attorney-client privilege does not exist to prevent the discovery of protected conduct and to foreclose a wrongful discharge claim just because illegal instructions are communicated by an attorney. The balance of interests clearly weighs in favor of exposing the City of Seattle's communications to the violate the PRA and to fraudulently deceive PRA requestors into believing that the Mayor's text missing had not been deleted.

**4. Whether the attorney-client privilege has been waived by the Defendant's voluntary disclosure is debatable.**

“The attorney-client privilege is waived if the client, the client's lawyer, or another authorized agent voluntarily discloses the communication in a non-privileged communication.” *Kittitas County v. Allphin*, 190 Wn.2d 691, 416 P.3d 1232 (2018) (quoting RESTATEMENT (THIRD) OF THE LAW GOVERNING LAWYERS § 79 (AM. LAW INST. 2000)). An attorney can waive any privilege by disclosing otherwise

privileged material if he or she is authorized to speak for the client “within the scope of that authority.” *Sitterson v. Evergreen School Dist. No. 114*, 147 Wn. App. 576, 584, 196 P.3d 735 (2008). No one can seriously question that documents produced in discovery without any claim of privilege are voluntarily disclosed.

Here, the SEEC investigative report dated May 6, 2021, references documentation of illegal instructions made by Chen and the objections lodged by Plaintiffs. SP003-004. The trial court ruled that supporting documentation privileged. SP0014-0020. The investigative report explicitly discusses the failure to inform PRA requestors about the lost texts and the failure to explain that the text messages were recreated messages obtained from persons other than the Mayor. SP001.

Unredacted portions of documentation in support of Plaintiff’s Whistleblower Complaint address instructions and objections to recreate text messages and narrowly construe PRA requests. For example, based upon a narrow construction of a

PRA request, Chen instructs Irwin to tell the requestor that “we do not have any responsive text communications.” SP0039-0040.

All of the above information was voluntarily disclosed by the Defendant. Having disclosed discussions about recreated text messages and narrowly construed PRA requests, it can no longer claim attorney-client privilege on those same subjects.

**5. Whether the work product doctrine applies is debatable.**

**a. Documents prepared in anticipation of litigation.**

“The work product does not shield records created during the ordinary course of business,” but applies only to those materials prepared in “anticipation of litigation.” *Morgan v. Federal Way*, 166 Wn.2d 747, 754, 213 Pl.3d 596 (2009). The work product doctrine should not encourage parties to “mechanically form[] their practices so as to make all documents appear to be prepared in ‘anticipation of litigation.’” *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 706 P.2d 212 (1985).

The Defendant claims that most of the documents at issue are protected by both the attorney-client privilege and work product. Because the trial court failed to explain its ruling it is impossible to know which documents it ruled are protected by work product, if any, as opposed to which documents are protected by the attorney-client privilege or both. The trial court's failure to explain its ruling makes it impossible to know if the correct legal standard was applied. See *Dietz v. Doe*, 131 Wn.2d 835, 851, 935 P.2d 611 (1977) (“The trial court failed to give sufficient guidance in its order finding privilege to enable the appellate court to determine whether the correct legal standard has been applied and whether the trial court acted within its discretion.”).

Nevertheless, there was no reason to anticipate litigation from either Plaintiff during the time they were directed to violate the PRA, at the time of their whistleblower complaint, or when the investigative report was filed. Moreover, the City had no reason to anticipate litigation from the PRA requestors during the

deception to make them believe that the Mayor's text messages had not been deleted. Whether the documents claimed to be work product were prepared in anticipation of litigation is debatable.

**b. Trial preparation materials.**

In relevant part, CR 26(b)(4) in part provides as follows:

*Trial Preparation: Materials.* [A] party may obtain discovery of documents and tangible things otherwise discoverable under subsection (b)(1) of this rule and prepared in anticipation of litigation or for trial by or for another party or by or for that other party's representative . . . only upon a showing that the party seeking discovery has substantial need of the materials in the preparation of such party's case and that the party is unable without undue hardship to obtain the substantial equivalent of the materials by other means.

The work product protection does not apply where the information is central to Plaintiffs' cause of action and is not obtainable from any other source. *See Pappas v. Holloway*, 114 Wn.2d 198, 212, 787 P.2d. 30 (1990).

Here, documents that might otherwise be protected by work product and that relate to instructions and efforts to narrowly interpret a PRA request, or to recreate the text messages



are central to Plaintiffs' claim. Plaintiffs are "unable without undue hardship to obtain the substantial equivalent of the materials by other means." RAP 26(b)(4).

**6. Whether the trial court erred in denying Plaintiff's motion for an *in camera* review is debatable.**

The threshold for an *in camera* review "need not be a stringent one." *U.S. v. Zolin*, 491 U.S. 554, 563 (1989). When requesting an *in camera* review, a party need only show "a factual basis sufficient to support a reasonable, good faith belief that *in camera* inspection may reveal evidence that information in the materials is not privileged." *In re Grand Jury Investigation*, 974 F.2d 1068, 1075 (9th Cir 1992). *See also Cook v. King County*, 9 Wn. App. 50, 54, 510 P.2d 659 (1973) ("[I]n cases where governmental privilege is asserted, *in camera* examination is a function which the judiciary must perform. 'Judicial control over the evidence in a case cannot be abdicated to the caprice of executive officers.')" (*citing U.S. v Reynolds*, 345 U.S. 1, 9 (1953)).

The documents at issue are mostly email communications to and from Plaintiffs and city officials relating to the decision to violate the PRA and Plaintiffs' objections to that decision. These communications are Plaintiffs' protected activity, and it is uncontested that the PRA was violated with the intent to deceive the PRA requestors. These facts support "a reasonable good faith belief that *in camera* inspection may reveal evidence that information in the materials is not privileged." *In re Grand Jury Investigation*, 974 F.2d at 1075 (emphasis added).

**7. Whether the trial court erred in compelling Ferreiro's deposition is debatable.**

"[D]iscretionary determination should not be disturbed on appeal except on a clear showing of abuse of discretion, that is, discretion manifestly unreasonable, or exercised on untenable grounds, or for untenable reasons. The trial court's reasons should, typically, be clearly stated on the record so that meaningful review can be had on appeal." *Rivers v. Washington State Conference of Mason Contractors*, 145 Wn. 2d 674, 684-

85, 41 P.3d 1175, 1180 (2002).

Here, Ferreiro objected to her deposition while the Plaintiffs' motion for an *in camera* review was pending in an effort to discover unprivileged information before her deposition. The trial court nevertheless compelled the deposition, awarded attorney fees, and denied Plaintiffs' motion for an *in camera* review all on the same day. No reasons were stated. Plaintiff Ferreiro's deposition is now scheduled for January 30, 2023, without the benefit of the unredacted records. Without an expeditious stay of proceeding, Ferreiro's deposition will be compelled without the benefit of unredacted information.

Whether the trial court abused its discretion in compelling Ferreiro's deposition is debatable.

**C. The Injury that Plaintiffs Would Suffer if a Stay is Denied Would Be Extreme While the Injury That Would Be Suffered By the Defendant If the Stay is Granted Would Be *de minimis*.**

The trial date has recently been reset to June 12, 2023 and discovery cut-off date is April 24, 2023. The Defendant's 46-

page privilege log was produced to Plaintiffs on October 21, 2002 and Plaintiffs filed their motion for *in camera* review on November 17, 2022. The Court of Appeals has informed Plaintiffs that earliest their motion for discretionary review can be heard is April 7, 2023.

Plaintiffs seek to discover all unprivileged information in sufficient time to afford them the opportunity to depose City officials based on that unprivileged information. Plaintiffs also seek all unprivileged information for use at trial. If Plaintiffs' motion for a stay is denied, the fruits of the appeal will be denied; even if the Motion for Discretionary Review is granted and their arguments sustained, Plaintiffs won't be able to take depositions with unprivileged information before the discovery cut-off date. Indeed, if Plaintiffs' arguments are sustained, it is unlikely that unprivileged information will be available prior to trial.

Plaintiffs have presented debatable issues. Considering the equities of forcing the Plaintiffs to trial with their hands tied behind their backs compared to the lack of any injury to the

Defendant, a stay is warranted.

The Defendant will object to a stay and allege that the memory of witnesses *might* be impaired and without any specificity will allege increased costs if the case is allowed to languish. These are objections are *de minimis* as compared to the Plaintiff's prejudice if the stay is denied.

**D. The Court Should Dispense with a Bond, Cash, or Other Security.**

RAP 8.1(b)(3) provides that "The appellate court ordinarily will condition such relief from enforcement of the trial court decision on the furnishing of a supersedeas bond, cash or other security." Here, there is no need for a bond, cash, or other security because there is nothing to secure. Moreover, Ferreiro is unemployed and Irwin is reemployed making substantially less than at the City of Seattle.

**VI. CONCLUSION**

For all the above-stated reasons, the Court should grant Plaintiffs' Motion Stay the Proceedings.

*I certify that this document contains 4,600 words, exclusive of words contained in any appendices, the title sheet, the table of authorities, the certificate of compliance, the certificate of service, signature blocks, and pictorial images in accordance with RAP 18.17.*

Respectfully submitted this 18th day of January 2023.

/s/ Jeffrey Needle

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**RAP 14.7(f)**  
**SUPPORTING PAPERS**

Seattle Ethics and Elections Commission Investigative Report, May 6, 2021. . . . .SP001

Revised and Updated Order Granting City of Seattle’s Motion for Privilege Determination, November 16, 2022. . . . . SP0014

Order Denying Motion to Reconsider Determination of Privilege, December 2, 2022. . . . . SP0021

Order Denying Plaintiffs’ Revised Motion to Compel Discovery and for In Camera Review and the Appointment of a Special Master, January 6, 2023. . . . .SP0023

Order Granting City of Seattle’s Motion To Compel Deposition of Plaintiff Kimberly Ferreiro, January 6, 2023. . . . . SP0027

Email Thread between Chen & Ferreiro, Subject: RE: Brooks #64365, March 5, 2021. . . . .SP0032

Mayor Jenny Durkan Letter to Wayne Barnett, July 2, 2021. . . . .SP0036

Email thread between Chen & Irwin, Subject: RE: Moritz PDR 59632 -- ACP Communication, January 15, 2021. . . . .SP0041

Defendant’s October 21, 2022 Letter to Plaintiffs’ Counsel with Privilege Log. . . . . SP0043

Investigative Report dated May 6, 2021

On March 4, 2021, the Executive Director of the Ethics and Elections Commission received a Whistleblower Complaint from one of the Mayor's Office's Certified Public Records Officers<sup>1</sup>, Stacy Irwin, regarding how the Mayor's Legal Counsel Michelle Chen had directed Irwin and her fellow CPRO Kim Ferreiro<sup>2</sup> to process various Public Records Act requests for the Mayor's text messages. Irwin and Ferreiro have agreed to allow their names to be used in this report.

In late August 2020, Chen, Irwin and Ferreiro learned that approximately ten months' worth of the Mayor's text messages (from August 28, 2019 to June 25, 2020) had not been retained on her city-issued phone or in any cloud-based account associated with her city phone. The reasons why those text messages were not retained was not part of the Complaint, and will not be addressed in this Report, except to note that there is no evidence Chen, Irwin or Ferreiro had any knowledge that the text messages were missing prior to the discovery in late August, 2020. Instead, in the Complaint, Irwin makes several allegations that potentially qualify as "improper governmental action" as defined in SMC 4.20.805 related to how the Mayor's Office responded to public records request for those text messages after the loss was discovered. The "improper governmental action" alleged in the Complaint is conduct that potentially violated the Public Records Act, Chapter 42.56 RCW.

The Complaint alleged that:

1. Irwin and Ferreiro were directed by Chen not to inform requesters that the Mayor's text messages had not been retained and the text messages the City was producing in response to their PRA requests were actually copies of the text messages obtained from persons who had sent text messages to or received text messages from the Mayor. These were referred to as "recreated" text messages.
2. Irwin and Ferreiro were directed by Chen to narrowly interpret 48 pending requests that Irwin and Ferreiro had identified as requesting the Mayor's text messages so that the Mayor's text messages were only responsive to 20 of those pending requests. Irwin and Ferreiro were also directed not to inform requestors that their requests were being interpreted to exclude the Mayor's text messages. As a result, at least three requests were closed without the requestors being informed regarding the Mayor's Office's narrowed interpretation.
3. Chen had proposed altering the "recreated" text messages to mask the fact that these versions of the messages did not come from the Mayor's phone.

The Complaint also includes a fourth claim regarding the interpretation of exemptions, but the events relating to this fourth claim occurred more than 12 months before the Complaint was filed, and given the factual circumstances regarding the application of those exemptions, there is no public interest that justifies reviewing them at this time. See SMC 4.20.830(A) (restricting any investigation to events that occurred within 12 months of the Complaint unless the Executive Director determines that the public interest justified an investigation of those older claims).

The Whistleblower Protection Code governs investigation of complaints of "improper governmental action." Under SMC 4.20.830, the SEEC's Executive Director is charged with

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<sup>1</sup> The public Records Officers are certified by the Washington Association of Public Records Officers.

<sup>2</sup> While Ferreiro did not sign the Complaint, she has stated that she assisted Irwin in preparing it and fully supports its claims. She has also fully cooperated with this investigation.



investigating Whistleblower Complaints. In this instance, after completing a preliminary investigation, the Executive Director launched a formal investigation into the allegations in Irwin's Complaint. Because these allegations involve the legal requirements of the Washington State Public Records Act, chapter 42.56 RCW, the Executive Director asked the Seattle City Attorney's Office to retain attorney Ramsey Ramerman to conduct the investigation and assist the Executive Director in preparing this report. Ramerman is a recognized authority on the PRA and currently is the co-editor-in-chief of the Washington State Bar Association's Public Records Act Deskbook.

When the Executive Director conducts an investigation and determines that improper governmental action, as defined by SMC 4.20.850(C)(1), has occurred, he is required to provide a written report detailing that determination to complainant (Irwin), to head of the department where the subject of the complaint works (here, the Mayor and City Attorney), and to such other officials as the Executive Director deems appropriate. When the allegations implicate a department head, the Executive Director shall provide the report to the Mayor and the City Council.

### SUMMARY CONCLUSIONS

1. The decision by Chen not to inform requestors that the Mayor's text messages had been lost and the City was producing an incomplete set of recreated text messages violated "best practices" for responding to PRA requests but did not necessarily violate the letter of the law. A/C Privilege

A/C Privilege

but there was no evidence establishing any bad faith. Thus, this allegation, while founded, does not qualify as "improper governmental action."

2. Chen's decision to narrowly interpret the majority of the 48 pending PRA requests for communications from the Mayor's Office so those requests were not requesting the Mayor's text messages violated the PRA's statutory mandate to provide "adequate responses" to PRA request. See RCW 42.56.520. Moreover, the evidence demonstrates that the decision to narrowly interpret these requests was a change of the normal practice in the Mayor's Office that was specifically made because 10-months of the Mayor's text messages had been lost. This decision to narrowly interpret the requests was a violation of the PRA and qualifies as improper governmental action.

3. While it would have been a violation of the PRA to alter the "recreated" text message in the manner proposed by Chen, this investigation has determined that unbeknownst to Irwin or Ferreiro, Chen did not follow through with this proposal, and the recreated texts were produced without alteration. Moreover, Chen's justification for this proposal was not unreasonable – she explained that certain "call detail" information was not part of the original text message, and therefore not responsive to the request. Thus, this allegation, while founded, does not qualify as improper governmental action because the Mayor's Office did not follow through with the proposal.

## DISCUSSION

On or about August 21, 2020, while gathering records to respond to various PRA requests, the Mayor's Office<sup>3</sup> discovered that approximately 10 months' worth of the Mayor's text messages<sup>4</sup> had not been retained, starting from August 28, 2019 to June 25, 2020. The Mayor's Office promptly contacted the IT department to seek help recovering the lost text messages. After it was determined that the Mayor's copies of those text messages could not be recovered, the Mayor's Office obtained a log of all of the Mayor's texts from the City's telecom provider and contacted all of the persons at the City who had exchanged text messages with the Mayor to see if the missing text messages could be "recreated" from those other copies. As of November 6, 2020, the Mayor's Office had identified 48 PRA requests that implicated the Mayor's text messages.

In addition to those PRA requests for the Mayor's text messages, the City was also involved in litigation where the City's opponents had made discovery requests for the Mayor's text messages. On October 6, 2020, the Mayor's Office informed the City Attorney's Office about this issue. This prompted the City Attorney's Office to hire an outside entity to conduct a forensic search of the Mayor's phones<sup>5</sup> to determine if any remnants of the missing text could be recovered and why the messages had not been retained.

The Whistleblower Complaint does not make any allegations regarding the cause of the lost text messages and this Report does not address that issue. Instead, the allegations relate to how Chen directed Irwin and Ferreiro to respond to PRA requests submitted to the Mayor's Office that had requested those text messages. While Chen claims in a May 4 letter that two CPROs exercised relative autonomy, the emails provided with the Complaint show Chen was closely managing all of the requests that sought the Mayor's texts and had directed the CPROs to allow her to review any installments before they were released.

### **1. Failure to Inform Requestors About the Lost Texts and to Explain that the Text Messages that Were Produced Were Recreated Text Messages Obtained from Persons Other than the Mayor.**

After it was determined that the Mayor's text messages could not be recovered from her phones, the Mayor's Office sought to obtain copies of the Mayor's text messages from persons in the City who had exchanged text messages with the Mayor. These were referred to as "recreated" text messages. The City was only able to obtain "recreated" copies of some of the Mayor's missing text messages.

When preparing to produce these recreated text messages, Irwin and Ferreiro explained to Chen they believed that when the City produced the recreated text messages, the City also needed to inform the requestors that these were recreated text messages, and that the Mayor's original text messages had been lost. Irwin and Ferreiro's position is documented in their emails to Chen that were provided with the

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<sup>3</sup> Irwin, Ferreiro and Chen worked closely together as a unit when responding to PRA requests on behalf of the Mayor's Office. Therefore, when this report refers to actions taken by the "Mayor's Office," it is referring to actions taken by one or more of these three persons that do not implicate fault for the allegations in the Complaint.

<sup>4</sup> In this report, the "Mayor's texts" refers to text messages sent or received by the Mayor on a city-issued phone.

<sup>5</sup> The Mayor's city-issued phone was replaced in October 2019 and again in July 2020, but the forensic investigation could not determine whether the loss of the text messages was related to the replacement of the Mayor's phones.

Complaint. Despite their objections, Chen directed Irwin and Ferreiro to produce the recreated text messages without any explanation and they complied. At least one requestor has noted that the texts were not from the Mayor's phone and filed an appeal challenging the adequacy of the City's response.

When interviewed, Chen stated that she had made this decision not to provide requestors with an explanation regarding the lost texts A/C Privilege

A/C Privilege s of October 6, 2020, the Mayor's Office and IT were still trying to determine if the text messages could be recovered or if other copies of those messages could be obtained from other sources. A/C Privilege & Work Product

A/C Privilege & Work Product

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In response to the allegations, Chen notes in her May 4 letter that in March 2021, she did agree with Ferreiro's suggestion about providing an explanation when producing the recreated texts. But documentation provided with the Complaint shows that prior to March 2021, Chen rejected similar advice and directed the two CPROs to produce the recreated records without any explanation. Chen's claim that she directed the CPROs to wait to produce text messages until the forensic search was completed is refuted by the same documentation.

## **2. Decision to Narrowly Interpret Pending PRA Requests to Exclude the Mayor's Text Messages.**

By November 6, 2020, the Mayor's office had at least 48 pending PRA requests that Irwin and Ferreiro had determined were seeking the Mayor's text messages and had therefore been kept open while the Mayor's Office, IT and the City Attorney's office investigated the missing text messages and sought to obtain recreated text messages from other sources. Most of these requests were considered "past due" based on the targeted response times that the Mayor's Office had set for itself. The oldest request had been submitted in January 2020.

As documented in several emails and a spreadsheet listing the 48 requests, on or about November 6, 2020, Chen decided to re-interpret the pending requests narrowly, with the result that only 20 of the 48

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<sup>6</sup> In March 2021, the City notified opposing counsel about the lost text messages.

requests were requesting the Mayor’s text messages. As memorialized in the “Notes” column in the November 6 spreadsheet, Chen determined that text messages were not responsive to the other 28 requests by determining (1) that request for the Mayor’s Office’s communication were not requests for the Mayor’s text messages unless the Mayor was specifically identified; and (2) that requests for “correspondence” (as opposed to communications) were only requests for letters or emails but not text messages.

Here are a few examples taken from that spreadsheet, with the request in the “Summary” column and Chen’s direction on how to interpret the requests in the “Notes” column:

<u>Summary of Request</u>	<u>Notes by Chen</u>
<ul style="list-style-type: none"> <li>• Request C064208: all correspondence between Mayor or Deputy Mayor and/or their office staff and ‘Tacoma Buffalo Soldiers Museum’ and ‘Historic Seattle’ regarding ‘Discovery Park’ and ‘The Discovery Park Fort Lawton Historic District’</li> </ul>	<ul style="list-style-type: none"> <li>• No - this request asks for correspondence not texts.</li> </ul>
<ul style="list-style-type: none"> <li>• Request C059261: Any and all documents, emails, texts, voice messages, etc. surrounding the decision to withdraw from the SPD East Precinct Building between May 25th, 2020 and the present.</li> </ul>	<ul style="list-style-type: none"> <li>• No - this does not specifically ask for JAMD texts. Does not apply to her.</li> </ul>
<ul style="list-style-type: none"> <li>• Request C059414: I request emails and communications from June 6, 2020 to the current date related to the “retreat” “tactical retreat” “surrender” “abandonment” “evacuation” or similar terms regarding the Seattle Police Department’s exit from the East Precinct. I also request the “operational plan” (mentioned by Chief Best in public statements) to evacuate the East Precinct. And, lastly, I request all emails and communications from the Mayor’s office since June 6, 2020 that mention the East Precinct.</li> </ul>	<ul style="list-style-type: none"> <li>• No - this does not specifically ask for JAMD texts. Does not apply to her.</li> </ul>
<ul style="list-style-type: none"> <li>• Request C059884: Please provide me with any records or communications (memos, letters, emails, text messages, voicemails, etc.) that reference an FBI-reported threat to the east precinct or any other police department facilities or staff. Please also provide me with any incoming and outgoing communications with staff of the FBI or any communications that refer the FBI at all. Conduct your search between May 25 and present day</li> </ul>	<ul style="list-style-type: none"> <li>• N - this request doesn’t even mention MO.</li> </ul>

Documentation provided with the complaint shows that the latter three requests were fulfilled and closed based on the narrowed interpretation.

The decision to narrowly interpret these requests represented a change in how the Mayor’s Office had interpreted the scope of similarly worded request. Prior to Fall 2020, when the Mayor’s Office received a PRA request for its communications, it interpreted “communications” to include the Mayor’s text messages and emails, even if the request did not specifically identify the Mayor herself. Under this

practice, the Mayor's text messages would have been responsive to all 48 pending requests. Beginning in early 2021, the Mayor's Office reverted to this prior practice of interpreting new PRA requests for communications to include the Mayor's text messages.

When first interviewed, Chen explained that she made the decision to narrowly interpret the requests in an effort to reduce the backlog of pending requests, which was historically high for the Mayor's Office. This explanation is consistent with the explanation she provided to Irwin and Ferreiro on November 9, when she explained that she adopted the narrowed interpretation because the duty to conduct "an adequate search" had to be balanced with the "competing interest" in responding to requests in a "timely and responsive" manner. The documentation provided with the Complaint shows Chen made this decision over the objections of Irwin and Ferreiro. No documentary evidence was provided that showed Chen consulted with the City Attorney's Office regarding these narrowed interpretations prior to February 2021 (after at least three of requests were closed using the narrowed interpretations).

In her May 4 letter, Chen claims that her notes in the November 6 spreadsheet only reflected her "initial" attempt to interpret the requests, and Chen identifies a second spreadsheet that she emailed the CPROs on February 10, in which she claims she adopted a broader interpretation the requests in the notes column so that the Mayor's texts were responsive to those requests. Chen further claims that she did not direct the CPROs to close any requests based on the narrowed interpretations in the November 6 spreadsheet.

Chen's assertion that the notes in the November 6 spreadsheet was only intended to be an initial interpretation that she did not intend the CPROs to act on, and that the notes in the February 10 spreadsheet reflected her final interpretation is not credible. First, in a November 9 email, Chen unequivocally told the CPROs that "The Notes column [in the November 6 spreadsheet] explains what I think should happen next." While Chen may have changed her mind at some later date, it is clear that as of November 9, Chen expected the CPROs to take actions based on her interpretations in the November 6 spreadsheet. This is further confirmed by two email exchanges between Chen and the CPROs on December 2. In the first email exchange (provided by Chen), Chen notes that there were only six or seven requests that were being held open while the forensic search was being completed. Given that there were 48 requests in the November 6 spreadsheet, Chen's December 2 email suggests that she believed the remaining requests were resolved based on her narrow interpretation of many of those requests. Nothing in that email suggests that the CPROs should delay responding to the requests that Chen had determined were not requesting the Mayor's texts. In the second exchange, Ferreiro raises her and Irwin's concerns about Chen's direction to narrowly interpret the requests and in response, and Chen responds by telling Ferreiro not to expect any change of course. Thus, as of at least December 2, Chen was still standing by her direction in the November 6 spreadsheet.

Moreover, Chen's February 10 spreadsheet does not show that Chen had directed the CPROs to abandon the narrow interpretations of 28 of the pending requests in the November 6 spreadsheet. First, Chen sent a follow-up email on February 11 providing guidance to Ferreiro on what requests should be included on the spreadsheet: "In terms of guidance for determining which PDRs request Mayor's text messages, I have selected only PDRs that specifically mention Mayor in the PDR request summary and specifically say 'texts', 'all electronic communications', 'all communications,' or 'all records' between mayor and ...." In other words, Chen was instructing Ferreiro to update the spreadsheet using a narrow interpretation that had not changed from Chen's guidance on November 6 in any material way. This guidance from Chen on the 11<sup>th</sup> conflict with the boarder interpretations Chen had made in notes column

in the February 10 spreadsheet, suggesting that Chen did not intend the CPROs to apply those broader interpretations.

Second, the February 10 spreadsheet only contained 10 of the 28 requests and Chen does not claim that she had also reinterpreted the scope of the requests not contained on the February 10 spreadsheet. Third, it is not clear that Chen actually notified the CPROs regarding her broader interpretation. The “notes” column with modified interpretations the February 10 version of the spreadsheet was “hidden” and both CPROs assert that they never saw those modified interpretations. The CPRO’s claim is supported by the fact that when Ferreiro updated the February 10 spreadsheet on February 11, she did not “unhide” the notes column, she removed the 10 remaining requests that had been narrowly interpreted in the November 6 spreadsheet, and she added six new requests without updating the hidden notes column. These actions are all consistent with Ferreiro’s claim that she had not seen the revised “notes” column in the February 10 spreadsheet, and suggest that it is likely that the CRPOs were not informed of any boarder interpretation. Collectively, this evidence undermines Chen’s assertion that she had intended the Mayors’ office to interpret the request using the boarder interpretation in the February 10 spreadsheet. But even if that was her intent, by February 10, the City had already fulfilled at least three requests using the narrow interpretations in the November 6 spreadsheet.

Chen also challenges the claim that she directed the CPROs to exclude the Mayor’s texts from the latter three requests identified above.

With regards to Request C059414, Chen claims that when she directed Irwin to close the request on December 22, 2020, she had assumed that the responsive text messages from the Mayor’s office had already been produced, and therefore was not intending Irwin to close the request based on the narrowed interpretation. Chen’s claim is refuted by the documents she provided with her May 4 letter. First, when Chen directed Irwin to close the request, she was responding to Irwin’s email, where she asked Chen, “Do you want me to go ahead and close it [Request C059414] because he specifically doesn’t call out the mayor ...?” In other words, Irwin was asking if Chen stood by the narrowed interpretation of the request in November 6 spreadsheet. Chen’s response – “Please close it” – demonstrates that Chen did still intend Irwin to use the narrowed interpretation. Second, Chen notes in her May 4 letter that she did not direct the CPROs to start searching and producing the Mayor’s recreated texts until February 9, 2021, so it would have been unreasonable for her to assume on December 22 that Irwin had already produced the Mayor’s recreated texts in earlier installments. Third, the emails Chen produced along with her May 4 letter shows that Irwin had previously provided Chen with copies of the earlier installments, so Chen knew (or should have known) that the Mayor’s texts had not been included in earlier installments.

With regards to Request C059261, Chen notes in her May 4 letter that she sent Irwin an email on November 9 directing her not to close this request. But the documentation provided with the Complaint shows that Chen directed Irwin to produce the final installment without waiting for the Mayor’s text messages on December 11, 2020, a full month after this November 9 email. And while Chen does direct Irwin to hold off closing the request in that November 9 email, it was only because of two unanswered questions that had nothing to do with the question of whether or not the Mayor’s text were responsive to the request. Moreover, in that same November 9 email, Chen responds to concerns Irwin raised about the narrowed interpretation of the request by reminding Irwin that the duty to search for records had to be balanced with the duty to provide prompt responses. Thus, nothing in this email exchange refutes the documented assertion in the Complaint that Chen directed Irwin to produce the final installment to this request without including the Mayor’s text messages.

With regards to Request C056884, Chen claims in her May 4 letter that Irwin unilaterally closed this request without consulting with Chen. Not only does documentation provided with the Complaint conflict with this claim, but all of the records reviewed as part of this investigation show that Chen was closely monitoring all of the requests for the Mayor's texts, and it is not credible to believe that Irwin would have made the unilateral decision to exclude the Mayor's texts when producing the responsive records.

In summary, the documentation reviewed in this investigation demonstrates that at Chen's direction, the Mayor's office relied on Chen's narrowed interpretation of the requests as documented in the November 6 spreadsheet to exclude the Mayor's text messages when fulfilling those requests, resulting in the requests being closed without producing the Mayor's texts.

### **3. Proposal to Alter the Recreated Text Messages to Remove Nonresponsive Information.**

When the City was able to locate copies of the Mayor's text messages on the phones of other employees, the City used software that extracted the text message along with call-detail information, including the phone number of the phone the message was extracted from. The software combined the substance of the text and the call-detail information into a single document. This meant that when the City produced one of the "recreated" text messages, it would also have to produce the call-detail information. The call-detail information would allow the requestor to see that the copies of the Mayor's text messages being produce were obtained from someone other than the Mayor.

When the Mayor's Office first produced the recreated text messages to one of the pending requests in December 2020 (without explaining that these were recreated texts or what had happened to the original copies of the texts), the City also produced the call-detail information. But in mid-February 2021, Chen proposed to Irwin that the City remove the call-detail information, reasoning that the call-detail information was not responsive to the pending requests, and would not have been included in the record if the City had been using a more primitive method of obtaining the texts, such as making an "old fashion photocopy" of the message on the screen of the phone.

Irwin objected, and ultimately Chen decided to continue to produce the recreated text messages without removing any call-detail information.

## **ANALYSIS**

### **1. Providing Explanations to Requestors Regarding the Lost and Recreated Text Messages**

When the Mayor's Office determined that the Mayor's text messages had been lost and could not be recovered, it properly attempted to obtain copies of those text message from other sources. Compare Neighborhood Alliance v. Spokane County, 172 Wn.2d 702, 723 (2011) (agency violated PRA when it failed to search for missing record on employee's old, recently replaced computer when the agency determined that the requested record was not located on the employee's current computer) with West v. Dep't of Natural Resources, 163 Wn. App. 235, 244-46 (2011) (no PRA violation where emails were inadvertently lost before request was made, and agency made a good-faith effort to recover the lost emails).

Normally, when an agency produces the requested records, the PRA does not require the agency to provide any explanation regarding those records. Bonamy v. City of Seattle, 92 Wn. App. 403, 409 (1998). But when an agency cannot produce all of the specific records that had been requested because some of the records were not retained or could not be located, the best practice is for the agency to “explain, at least in general terms, the place searched.” Neighborhood Alliance, 172 Wn.2d at 723; see also Fisher Broadcasting v. City of Seattle, 180 Wn.2d 515, 523 (2014) (“When an agency denies a public records request on the grounds that no responsive records exist, its response should show at least some evidence that it sincerely attempted to be helpful.”).

The Neighborhood Alliance case is instructive because it also included a “recreated” record. In that case, the plaintiff made a PRA request after it was provided with a leaked but undated county seating chart that assigned cubicles to a “Ron” and a “Steve” for two open positions that had not been posted. It was believed that “Steve” was Steve Harris, the son of a county commissioner, and “Ron” was Ron Hand, a former employee. After posting the positions, the County in fact did end up hiring Steve Harris and Ron Hand for those two positions.

In an effort to prove the County was engaged in illegal hiring practices, the Plaintiff made a PRA requests for two categories of documents: (1) a log from the computer used by the person who had prepared the seating chart that identified the date the seating chart was created; and (2) documents that identified the “Ron” and “Steve” that were listed on the seating chart.

Shortly after the first media story appeared about the leaked seating chart, the employee who had prepared the seating chart was assigned a new computer. When content of her old computer was copied onto her new computer, this had the effect of changing the “creation date” of all of her documents – including the seating chart – to the date of this transfer. To fulfill the request for the log, the County took the log from the new computer, which meant it contained the incorrect “creation date” for the seating chart. The County not only failed to search the old computer, it made no effort to explain to the requestor that the log was not generated from the actual computer that had been used to draft the seating chart or otherwise address the issue of the erroneous date.

All of these facts eventually came out after the Plaintiff sued and engaged in discovery. Ultimately, the Supreme Court ruled that the County violated the PRA by failing to search the old computer to obtain an accurate log, but it also noted that the County should have informed the Plaintiff that the log it provided was essentially as recreated record, and was not the log actually requested. Neighborhood Alliance, 172 Wn.2d at 723.

While the Supreme Court’s statements in Neighborhood Alliance and Fisher regarding whether an agency needs to provide an explanation are arguably “dicta,” and therefore non-binding, it is unquestionably a best practice for an agency to explain any such anomaly that materially impacts what records are produced, and the failure to provide an explanation could be a factor in any penalty determination. See also RCW 42.56.100 (requiring agencies to provide the “fullest assistance” to requestors); PUBLIC RECORDS ACT DESKBOOK: WASHINGTON’S PUBLIC DISCLOSURE AND OPEN PUBLIC MEETINGS LAWS § 6.4(5) at 6-21-22 (WSBA 2d ed. 2014) (noting the importance to communicating with requestors).

Here, Irwin and Ferreiro were correct when they informed Chen that the City should explicitly inform requestors that the Mayor’s Office was producing “recreated” text message obtained from other



sources and why this was necessary

A/C Privilege & Work Product

A/C Privilege & Work Product

A/C Privilege & Work Product

the investigation did not uncover any evidence that Chen's decision not to provide an explanation when producing the recreated text was not made in a good-faith effort

A/C Privilege

A/C Privilege & Work Product

Chen's claim in her May 4 letter that she had directed the CPROs to wait for the results of the forensic search before responding to requests that sought the Mayor's text messages is refuted by her own statements documented in the emails provided with the Complaint and therefore is not credible. Likewise, Chen's claim that the CPROs were exercising any independent discretion when responding to the requests for the Mayor's text messages is also refuted by contemporaneous emails and therefore not credible.

While this first allegation in the Whistleblower Complaint raises a valid concern based on best practices, the failure to provide an explanation does not violate any express statutory requirement in the PRA. And because Chen made this decision not to provide an explanation based on

A/C Privilege & Work Product

A/C Privilege & Work Product

A/C Privilege & Work Product

Chen's actions regarding the first claim did not amount to "improper governmental action" as defined in SMC 4.20.805.

## 2. Narrowly Interpreting Certain Requests to Exclude the Mayor's Text Messages.

When responding to PRA requests, agencies are required to provide "the fullest assistance to inquirers," which requires agencies to "respond with reasonable thoroughness and diligence." Andrews v. Wash. State Patrol, 183 Wn. App. 644, 653 (2014). When a request is unclear and could be interpreted broadly or narrowly, and the agency intends to interpret the request narrowly, then the agency should inform the requestor about that interpretation so the requestor has an opportunity to clarify if the requestor intended a broader interpretation. See, e.g., Gale v. City of Seattle, 2014 Wash. App. LEXIS 346, at \*30-\*32 (Wash. App. Feb. 20, 2014) (unpublished) (City properly limited scope of its search to certain terms where City told the requestor what search terms it planned to use and invited the requestor to provide additional terms). But when an agency adopts an interpretation of a request for the purpose of excluding certain records from the scope of the request without proving the requestor the opportunity to clarify, the agency violates the PRA. See, e.g., Neighborhood Alliance, 172 Wn.2d at 721 n.10, 727 (holding agency's unilateral, narrow interpretation of the plaintiff's request violated the PRA and justified an increased penalty award); see also Cedar Grove Composting, Inc. v. City of Marysville, 188 Wn. App. 695, 727-728 (2015) (agency violated the PRA when it intentionally interpreted a request narrowly to avoid producing certain records).

For example, in Neighborhood Alliance, in response to the plaintiff's request for records that identified the "Ron" and "Steve" on the leaked "seating chart," the County interpreted it as specifically requesting documents that contained all three categories of information: the term "seating chart" and information that identified Ron and Steve. The County adopted this interpretation knowing that the County did not use the term "seating chart," and instead referred to the documents like the leaked document as a "floor plan" or "cubicle layout." In other words, the County adopted an interpretation that the County knew would exclude the records the requestors were trying to obtain. Neighborhood Alliance,

172 Wn.2d at 721 n.10. The Court held that this narrowed interpretation violated the PRA, especial when it effectively allows an agency to “silently withhold” the records the requestor is seeking. See Neighborhood Alliance, 172 Wn.2d at 721 n.10, 724, 727 & n.16.

Here, Irwin’s Complaint regarding Chen’s direction to narrowly interpret the request is well taken. First, there is no principled basis for excluding the Mayor’s text messages from the scope of requests for all communications with the Mayor’s Office, or from requests for the Mayor’s “correspondence.” See West v. City of Tacoma, 12 Wn. App. 2d 45, 80-81 (2020) (rejecting city’s argument that the requestor should have requested “communications” if he wanted emails instead of just requesting “records”). The Mayor is of course part of the Mayor’s Office, and text messages are a form of correspondence. It is also noteworthy that the Mayor’s emails were not excluded from requests for all communications with the Mayor’s Office.

Second, Chen’s narrowed interpretation marked a change in practice for the Mayor’s Office that cannot be justified by the wording in the requests or any change in the law. Prior to Fall 2020, the Mayor’s Office had interpreted similar requests to include the Mayor’s text messages. Moreover, in recent months, the Mayor’s Office has returned to that interpretation. This is strong evidence to show that the narrowed interpretation was adopted to limit the number of requests that could be impacted by the lost text messages. While Chen has stated that she adopted this narrowed interpretation to help comply with another mandate of the PRA – the duty to provide a prompt response – there is no basis for silently narrowing the scope of a request to meet that obligation.

Finally, if Chen believed the intended scope of the requests was in fact unclear, at the very least Chen should have directed Irwin or Ferreiro to inform the requestors that the City had interpreted the request to exclude the Mayor’s text messages. See Canha v. DOC, 2016 Wash. App. LEXIS 836 at \*9 to\*10 (Wn. App. Apr. 25, 2016) (unpublished) (rejected claim that agency interpreted request too narrowly when agency informed requestor of its interpretation and requestor did not provide any clarification before filing suit). Had this been done, it would have given the requestors the opportunity to clarify or to make new requests for those text messages.

Chen’s claim that the narrowed interpretations recorded in the “Notes” column in the November 6 spreadsheet was only an initial interpretation and that by February 10 she had adopted a broader interpretation does not excuse her conduct. First, by February 10, the City had already closed at least three of the requests based on the narrowed interpretation, so the revised interpretations came too late. Second, although the “notes” column in the February 10 spreadsheet contained broader interpretations of 10 of the requests, that column was “hidden” and remained hidden in Ferreiro’s updated February 11 spreadsheet, demonstrating that Ferreiro was not aware of Chen’s revision to her interpretations of the request. Third, Chen directed Ferreiro on February 11 to update the spreadsheet using a narrowed interpretation, not the broader interpretation in the hidden “notes” column. Thus, the February 10 spreadsheet does not establish that Chen had rescinded her prior direction to narrowly interpret certain request before those requests were completed.

Chen’s claim that she was not responsible for the narrowed interpretation of the three request that were closed is not credible in light of the documentary evidence that shows Chen was closely monitoring all of the requests that implicated the missing text messages.<sup>7</sup>

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<sup>7</sup> Chen has also complained that she was not given sufficient time to review her records to respond to the allegations in the Complaint. Chen was notified about the Complaint on April 6, and when she was interviewed on April 9, she was informed of the specific allegations, including the allegation that she had narrowly interpreted the request in the

In summary, Chen’s decision to narrowly interpret requests to exclude the Mayor’s text messages, and her direction to Irwin and Ferreiro to fulfill at least three of those requests based on this narrowed interpretation without informing the requestor about the text messages violated the PRA. As a result, Chen’s actions qualify as “improper governmental action” as defined in SMC 4.20.805.

### **3. Proposal to Remove Non-Responsive Information from Recreated Text Messages.**

Under Washington Law, once an agency determines that a particular record is responsive to a PRA request, an agency can only redact information from that record based on a valid exemption. Mechling v. City of Monroe, 152 Wn. App. 830, 854-55 (2009). In other words, Washington Courts have effectively rejected a practice common at federal agencies where federal agencies regularly redact information in records responsive to Freedom of Information requests based on the determination that the information was not responsive to the request. See, e.g., Conti v. Dep’t of Homeland Sec., 2014 U.S. Dist. LEXIS 42544 at \*75 (S.D.N.Y Mar. 24, 2014) (holding agency properly redacted nonresponsive information in response to FOIA request). Thus, Irwin’s allegation regarding Chen’s proposal to remove the call-detail information is based on an accurate reading of the Washington law.

But because the Mayor’s Office ultimately decided not to follow this plan and instead chose to produce the text messages without removing the call-detail information, there was no violation of the PRA and thus no improper governmental action. Nor was there evidence demonstrating that Chen made this proposal in bad faith. As Chen explained, the call-detail information was not part of the substantive text message and would not have been part of the response if the City could produce the Mayor’s copies of the text messages. Nor would the call-detail information have been included if the City had chosen to recreate the lost text messages by photocopying the screen of the other employee’s phones.

### **SUMMATION**

First, while the failure to explain to some requestors that the City was producing recreated copies of the Mayor’s text messages was contrary to best practices, it did not clearly violate the law, and thus did not amount to improper governmental action.

Second, Chen’s decision to narrowly interpret pending PRA requests to avoid the need to disclose to those requestors information that could lead that discovery that 10-months’ worth of the Mayor’s text messages were not retained violated the Public Records Act and amounts to improper governmental action.

Third, because the Mayor’s Office ultimately did not carry through with the plan to redact call-detail information from the recreated text messages that was not responsive, there was no improper governmental action based on this claim.

The records reviewed during this investigation show that Irwin and Ferreiro were knowledgeable public records officers who strived to follow best practices when responding to PRA requests. It is recommended that the Mayor’s Office give full consideration to the opinions of and guidance from its

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November 6 spreadsheet. This allowed Chen adequate time to obtain and review her documents and to respond to the allegations. Chen nevertheless waited until April 26 to request her records from IT. Thus, if she was not able to fully review those documents, it is because of her own decision not make this request to IT until this later date. Moreover, the documentation Chen did provide establishes at the very least that Chen knew Ferreiro was applying Chen’s narrow interpretation of Request C059414 when Chen directed her to close that request, and that direction alone amounts to “improper governmental conduct.” Therefore, additional records could not change that conclusion.

public records officers in the future and consider consulting with the public records unit at the City Attorney's Office before disregarding any advice the public records officers might provide.

By: Wayne Barnett  
Executive Director  
Seattle Ethics & Elections Commission

Ramsey Ramerman  
Special Counsel to the Director

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,

NO. 21-2-11739-9 SEA

Plaintiffs,

**REVISED AND UPDATED ORDER  
GRANTING CITY OF SEATTLE'S  
MOTION FOR PRIVILEGE  
DETERMINATION**

v.

CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,

Defendant.

THIS MATTER came before the Court on Defendant City of Seattle's Motion for Privilege Determination (the "Motion"), and the Court having considered:

- (a) The Pleadings and files in this matter;
- (b) The Motion;
- (c) The Documents submitted *in-camera*;
- (d) Declaration of Brandi Balanda in Support of the Motion and exhibits thereto;
- (e) Declaration of Joseph Groshong in Support of the Motion;
- (f) Plaintiffs' Opposition to the Motion;
- (g) Declaration of Jeffrey Needle in Opposition to Motion to Determine Privilege with exhibits;
- (h) Defendant's Reply; and

1 (i) having considered oral argument on August 31, 2022;  
2 and having been familiar with the files and records in this case is fully advised.

3 NOW, THEREFORE, the Motion is **GRANTED** in part as follows:

4 1. For the following Documents, the City's asserted attorney-client and/or work  
5 product privilege is sustained:

- 6 a. COS\_00007164-COS\_00007176 (IRWIN\_0000659-IRWIN\_0000671);
- 7 b. COS\_00007180 (IRWIN\_0000725);
- 8 c. COS\_00007046-COS\_00007047 (FERREIRO\_000094-  
9 FERREIRO\_000095);
- 10 d. COS\_00007048-COS\_00007050 (FERREIRO\_000099-  
11 FERREIRO\_0000101);
- 12 e. COS\_00007052 (FERREIRO\_0000105);
- 13 f. COS\_00007117 (IRWIN\_0000269);
- 14 g. COS\_00007141-COS\_00007143 (IRWIN\_0000329-IRWIN\_0000331);
- 15 h. COS\_00007154-COS\_00007156 (IRWIN\_0000377-IRWIN\_0000379);
- 16 i. COS\_00007039-COS\_00007040 (FERREIRO\_000085-  
17 FERREIRO\_000086);
- 18 j. COS\_00007051 (FERREIRO\_0000104);
- 19 k. COS\_00007070-COS\_00007071 (FERREIRO\_0000238-  
20 FERREIRO\_0000239);
- 21 l. COS\_00007032-COS\_00007034 (FERREIRO\_000078-  
22 FERREIRO\_000080);
- 23 m. COS\_00007053-COS\_00007054 (FERREIRO\_0000108-  
24 FERREIRO\_0000109);
- 25 n. COS\_00007055-COS\_00007056 (FERREIRO\_0000116-  
26 FERREIRO\_0000117);

- 1 o. COS\_00007072-COS\_00007073 (FERREIRO\_0000240-  
2 FERREIRO\_0000241);
- 3 p. COS\_00007118-COS\_00007119 (IRWIN\_0000273-IRWIN\_0000274);
- 4 q. COS\_00007120 (IRWIN\_0000275);
- 5 r. COS\_00007121-COS\_00007124 (IRWIN\_0000276-IRWIN\_0000279);
- 6 s. COS\_00007125-COS\_00007128 (IRWIN\_0000280-IRWIN\_0000283);
- 7 t. COS\_00007133-COS\_00007135 (IRWIN\_0000297-IRWIN\_0000299);
- 8 u. COS\_00007139-COS\_00007140 (IRWIN\_0000326-IRWIN\_0000327);
- 9 v. COS\_00007144-COS\_00007146 (IRWIN\_0000332-IRWIN\_0000334);
- 10 w. COS\_00007147 (IRWIN\_0000335);
- 11 x. COS\_00007148-COS\_00007149 (IRWIN\_0000350-IRWIN\_0000351);
- 12 y. COS\_00007150-COS\_00007153 (IRWIN\_0000373-IRWIN\_0000376);
- 13 z. COS\_00007157-COS\_00007159 (IRWIN\_0000384-IRWIN\_0000386);
- 14 aa. COS\_00007029 (FERREIRO\_000045);
- 15 bb. COS\_00007030-COS\_00007031 (FERREIRO\_000046-  
16 FERREIRO\_000047);
- 17 cc. COS\_00007038 (FERREIRO\_000084);
- 18 dd. COS\_00007041-COS\_00007042 (FERREIRO\_000089-  
19 FERREIRO\_000090);
- 20 ee. COS\_00007043 (FERREIRO\_000091);
- 21 ff. COS\_00007044 (FERREIRO\_000092);
- 22 gg. COS\_00007045 (FERREIRO\_000093);
- 23 hh. COS\_00007066 (FERREIRO\_0000232);
- 24 ii. COS\_00007067-COS\_00007068 (FERREIRO\_0000233-  
25 FERREIRO\_0000234);
- 26 jj. COS\_00007069 (FERREIRO\_0000235);
- 27 kk. COS\_00007109 (IRWIN\_0000261);

1           ii. COS\_00007110-COS\_00007111 (IRWIN\_0000262-IRWIN\_0000263);  
2           mm. COS\_00007112 (IRWIN\_0000264);  
3           nn. COS\_00007113-COS\_00007114 (IRWIN\_0000265-IRWIN\_0000266);  
4           oo. COS\_00007058-COS\_00007061 (FERREIRO\_0000205-  
5           FERREIRO\_0000208);  
6           pp. COS\_00007077-COS\_00007080 (FERREIRO\_0000247-  
7           FERREIRO\_0000250);  
8           qq. COS\_00007092-COS\_00007093 (IRWIN\_0000149-IRWIN\_0000150);  
9           rr. COS\_00007094 (IRWIN\_0000163);  
10          ss. COS\_00007115-COS\_00007116 (IRWIN\_0000267-IRWIN\_0000268);  
11          tt. COS\_00007095-COS\_00007096 (IRWIN\_0000173-IRWIN\_0000174);  
12          uu. COS\_00007107-COS\_00007108 (IRWIN\_0000187-IRWIN\_0000188);  
13          vv. COS\_00007181-COS\_00007184 (IRWIN\_0000734-IRWIN\_0000737);  
14          ww. COS\_00007185-COS\_00007189 (IRWIN\_0000738-IRWIN\_0000742);  
15          xx. COS\_00007100-COS\_00007106 (IRWIN\_0000180-IRWIN\_0000186);  
16          yy. COS\_00007090 (IRWIN\_0000141);  
17          zz. COS\_00007130 (IRWIN\_0000294);  
18          aaa. COS\_00007131 (IRWIN\_0000295).

19           2. For the following Documents, the City's asserted attorney-client and/or work  
20 product privilege is overruled:

21           a. COS\_00007160-COS\_00007163 (IRWIN\_0000602-IRWIN\_0000605);  
22           b. COS\_00007035-COS\_00007037 (FERREIRO\_000081-  
23           FERREIRO\_000083);  
24           c. COS\_00007074-COS\_00007076 (FERREIRO\_0000242-  
25           FERREIRO\_0000244).

26           3. For the following Documents, the City's asserted attorney-client and/or work  
27 product privilege is sustained in part:




- 1 a. COS\_00007062-COS\_00007065 (FERREIRO\_0000220-  
2 FERREIRO\_0000223): The asserted privilege on COS\_00007062 is  
3 overruled; the asserted privilege on COS\_00007064 and COS\_00007065 is  
4 sustained.
- 5 b. COS\_00007097-COS\_00007099 (IRWIN\_0000177-IRWIN\_0000179): On  
6 Irwin 0000177, the first asserted privilege is sustained. The second which  
7 begins with “pretty soon ...” is not privileged. The blue highlighted privilege  
8 on Irwin 0000178 is sustained.

9 4. Plaintiffs shall not disclose or use any of the information ruled by this Court to  
10 be the City’s privileged attorney-client information and/or protected work product (collectively,  
11 the “Privileged Information”) in any way.

12 5. Plaintiffs shall destroy any and all documents, whether electronic or hard copy,  
13 that contain any portion of the Privileged Information within ten business days of entry of this  
14 Court’s November 1, 2022 Preliminary Order Granting City of Seattle’s Motion for Privilege  
15 Determination and shall confirm their compliance in writing to the City.

16  
17  
18 **IT IS SO ORDERED.**

19 DATED this 16<sup>th</sup> day of November, 2022.

20  
21   
22 \_\_\_\_\_  
23 The Honorable Suzanne R. Parisien  
24  
25  
26  
27

1 PRESENTED BY:

2 **SAVITT BRUCE & WILLEY LLP**

3  
4 By: s/ James P. Savitt

5 James P. Savitt, WSBA #16847

6 Sarah Gohmann Bigelow, WSBA #43634

7 1425 Fourth Avenue Suite 800

8 Seattle, Washington 98101-2272

9 Telephone: 206.749.0500

10 Facsimile: 206.749.0600

11 Email: [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)

12 Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

13 *Attorneys for Defendant City of Seattle*

1 CERTIFICATE OF SERVICE

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

5 Susan B. Mindenbergs, WSBA #20545  
6 Law Office of Susan B. Mindenbergs  
7 705 Second Avenue, Suite 1050  
8 Seattle, WA 98104  
9 Telephone: (206) 447-1560  
10 Facsimile: (206) 447-1523  
11 Email: [susanmm@msn.com](mailto:susanmm@msn.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

12 *Attorney for Plaintiffs*

13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
15 705 Second Avenue, Suite 1050  
16 Seattle, WA 98104  
17 Telephone: (206) 447-1560  
18 Facsimile: (206) 447-1523  
19 Email: [jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)  
20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
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- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 SIGNED on this 14th day of November, 2022 at Seattle, Washington.

23 

24 Rondi A. Greer

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IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,	)	
	)	NO. 21-211739-9 SEA
Plaintiffs,	)	<del>GRANTING</del> DENYING
	)	ORDER <del>GRANTING</del> MOTION TO
V.	)	RECONSIDER DETERMINATION
	)	OF PRIVILEGE
CITY OF SEATTLE, a municipal corporation,	)	
	)	
Defendant.	)	
	)	

THIS MATTER having come on before the undersigned judge of the above-entitled court and the Court having read all pleadings filed in support and in opposition, and being <sup>fully</sup> ~~fully~~ advised.

IT IS HEREBY ORDERED that the Plaintiffs' Motion to Reconsider the Revised and Updated Order granting the City of Seattle's Motion for a Determination of Privilege entered on November 16, 2022 is ~~GRANTED~~ <sup>DENIED</sup>.

Dated this 2<sup>nd</sup> day of December, 2022.



\_\_\_\_\_  
Judge Suzanne R. Parisien

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Presented by:

          /s/ Jeffrey Needle            
Jeffrey Needle, WSBA #6346  
Susan Mindenbergs, WSBA #20545  
Attorneys for Plaintiffs

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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,  
  
Plaintiffs,  
  
v.  
  
CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,  
  
Defendant.

NO. 21-2-11739-9 SEA

**ORDER DENYING PLAINTIFFS’  
REVISED MOTION TO COMPEL  
DISCOVERY AND FOR *IN CAMERA*  
REVIEW AND THE APPOINTMENT  
OF A SPECIAL MASTER**

THIS MATTER came before the Court on Plaintiffs’ Revised Motion to Compel  
Discovery and for *In Camera* Review and the Appointment of a Special Master (the “Motion”),  
and the Court having considered:

- (a) The Pleadings and files in this matter;
- (b) The Motion;
- (c) Declaration of Stacy Irwin;
- (d) Declaration of Kimberly Ferreiro;
- (e) The Revised Declaration of Jeffrey Needle ISO the Motion;
- (f) Defendant City of Seattle’s Opposition to the Motion;
- (g) Declaration of Sarah Gohmann Bigelow ISO Opposition to the Motion;
- (h) Plaintiffs’ Reply;



1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that  
3 on this date, I caused a true and correct copy of the foregoing document to be served on the  
4 following in the manner(s) indicated:

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12 *Attorney for Plaintiffs*

13 Jeffrey L. Needle, WSBA #6346  
14 Law Office of Jeffrey L. Needle  
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17 Telephone: (206) 447-1560  
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20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
- Via Email
- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 DATED this 29<sup>th</sup> day of November, 2022 at Seattle, Washington.

23  
24  
25  
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27  
  
Meghan Parker



King County Superior Court  
Judicial Electronic Signature Page

Case Number: 21-2-11739-9  
Case Title: IRWIN ET ANO VS SEATTLE CITY OF  
Document Title: ORDER RE MOTION FOR IN CAMERA REVIEW  
  
Signed By: Suzanne Parisien  
Date: January 06, 2023



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Judge: Suzanne Parisien

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: C500F9769F1E11AD3B962C5FEC95F1413821C70B  
Certificate effective date: 7/16/2018 2:19:35 PM  
Certificate expiry date: 7/16/2023 2:19:35 PM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Suzanne Parisien:  
VMmj0wrS5hGRAa/2AFk6yQ=="

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

STACY IRWIN and KIMBERLY FERREIRO,

Plaintiffs,

v.

CITY OF SEATTLE, a municipal corporation  
under the laws of the State of Washington,

Defendant.

NO. 21-2-11739-9 SEA

**ORDER GRANTING CITY OF  
SEATTLE'S MOTION TO COMPEL  
DEPOSITION OF PLAINTIFF  
KIMBERLY FERREIRO**

THIS MATTER came before the Court on Defendant City of Seattle's Motion to Compel Deposition of Plaintiff Kimberly Ferreiro (the "Motion"), and the Court having considered:

- (a) The Pleadings and files in this matter;
- (b) The Motion;
- (c) Declaration of Sarah Gohmann Bigelow in Support of the Motion and exhibits thereto;
- (d) Plaintiffs' Opposition to the Motion with supporting Declaration; and
- (e) Defendant's Reply;

and having been familiar with the files and records in this case is fully advised.

1 NOW, THEREFORE, the Motion is **GRANTED** as follows:

2 1. The City is free to note and take depositions, subject to the applicable civil rules,  
3 including but not limited to the depositions of the named Plaintiffs, in whatever sequence it  
4 chooses and irrespective of who Plaintiffs have deposed. Plaintiffs are not permitted to control  
5 the sequence of the City's depositions.

6 2. Plaintiff Kimberly Ferreiro must appear for her video-taped deposition within  
7 fourteen (14) days of this Order at a mutually agreed upon time and date.

8 3. Plaintiffs shall pay the reasonable attorneys' fees and costs incurred by the City  
9 in making this motion. If the parties cannot agree on the amount of such fees and costs, then  
10 the City may apply for them to the Court by motion.

11 **IT IS SO ORDERED.**

12 DATED this \_\_\_\_ day of \_\_\_\_\_, 2022.

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The Honorable Suzanne R. Parisien

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24 PRESENTED BY:

25 **SAVITT BRUCE & WILLEY LLP**

26  
27 By: s/James P. Savitt

1 James P. Savitt, WSBA #16847  
2 Sarah Gohmann Bigelow, WSBA #43634  
3 1425 Fourth Avenue Suite 800  
4 Seattle, Washington 98101-2272  
5 Telephone: 206.749.0500  
6 Facsimile: 206.749.0600  
7 Email: [jsavitt@sbwLLP.com](mailto:jsavitt@sbwLLP.com)  
8 Email: [sgohmannbigelow@sbwLLP.com](mailto:sgohmannbigelow@sbwLLP.com)

9 *Attorneys for Defendant City of Seattle*  
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12 *Attorney for Plaintiffs*

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20 [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)

- Via E-Filing
- Via Legal Messenger
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- Via U.S. Mail
- Via Fax

21 *Attorney for Plaintiffs*

22 DATED this 18th day of November, 2022 at Seattle, Washington.

23   
Meghan Parker

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 21-2-11739-9  
Case Title: IRWIN ET ANO VS SEATTLE CITY OF  
Document Title: ORDER RE MOTION TO COMPEL  
Signed By: Suzanne Parisien  
Date: January 06, 2023



---

Judge: Suzanne Parisien

This document is signed in accordance with the provisions in GR 30.

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Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Suzanne Parisien:  
VMmj0wrS5hGRAa/2AFk6yQ=="

**From:** [Ferreiro, Kimberly](#)  
**To:** [Irwin, Stacy](#)  
**Subject:** FW: Brooks #64365  
**Date:** Friday, March 5, 2021 8:54:18 AM

---

FYI

**From:** Chen, Michelle <Michelle.Chen@seattle.gov>  
**Sent:** Thursday, March 4, 2021 7:29 PM  
**To:** Ferreiro, Kimberly <Kimberly.Ferreiro@seattle.gov>  
**Subject:** Re: Brooks #64365

Kim,

Let's work on the message more, because how you have it worded is not accurate either. Since we have a second installment we can figure it out later and not hold this first installment up. Just invoice her and apologize for delay.

A/C Privilege

A/C Privilege

uring part of that pre covid period I had in person legal briefing time and I was reviewing, retrieving texts by asking her for responsive texts and we produced them.

A/C Privilege

Also, I realize the iExplorer format of the texts we produce has the "export details" of who's phone numbers and who's on the chat so I think that is very transparent in terms of where the record comes from.

Thanks and if you want to talk tomorrow I'm available.  
Michelle

[Get Outlook for iOS](#)

---

**From:** Ferreiro, Kimberly <Kimberly.Ferreiro@seattle.gov>  
**Sent:** Thursday, March 4, 2021 6:44 PM  
**To:** Chen, Michelle  
**Subject:** RE: Brooks #64365

My suggestion has always been that we tell the truth:

"The records that you are receiving are recreations of messages from other members of the Mayor's office. Due to a technical issue the Mayor has no text messages between 8/28/2019 – 6/25/2020."

Let me know how to proceed, Kim

---

**From:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 6:02 PM  
**To:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Subject:** Re: Brooks #64365

Pls draft up what you think it should say and I will look at it.

Also I realize you may have seen personal notes that I took in OneNote that I did not intend for anyone else to see so I apologize and am embarrassed for accidentally sending you and Stacy my entire notes. I only meant to send the page with the pdf of the texts.

Thanks,  
Michelle

Sent from my iPhone

On Mar 4, 2021, at 5:20 PM, Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)> wrote:

OK will invoice tomorrow! I think we should let the requester know these are recreated message but will follow your direction. I did receive your text message via one note . When you first sent them you sent me the wrong link but I have them now. I'll work on those in the next couple of weeks which will be the final installment.

---

**From:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 4:58 PM  
**To:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Subject:** RE: Brooks #64365

Did you and Stacy access the text messages through OneNote?? I need to know if that is a way to share info or if SharePoint is better?

I think we just invoice with a message that says something about sorry for the delay...

---

**From:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 4:54 PM  
**To:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Subject:** RE: Brooks #64365

Yes, I have received your text messages. This is the first installment for Kris and there will be one more only.



---

**From:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 4:52 PM  
**To:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Subject:** RE: Brooks #64365

Is this the first and only installment or will we be giving her more installments?

Did that OneNote work for you and Stacy or was the Sharepoint link better?

---

**From:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 4:50 PM  
**To:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Subject:** RE: Brooks #64365

Should I just release as is? Not advising recreating messages? Just invoice?

---

**From:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 4:44 PM  
**To:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Subject:** RE: Brooks #64365

Ok, I have reviewed and would note that there are some texts dated March and Feb which is outside of the May 1-sept 20 date range, but I'm ok with that.

Thanks for jumping on it to cover while Stacy is out.

---

**From:** Ferreiro, Kimberly <[Kimberly.Ferreiro@seattle.gov](mailto:Kimberly.Ferreiro@seattle.gov)>  
**Sent:** Thursday, March 4, 2021 3:33 PM  
**To:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>  
**Subject:** Brooks #64365

Michelle,

I have reviewed this request and saw in GovQA Kris has asked "what is taking so long" I believe you may have already reviewed the attached so I'd like to invoice Kris tomorrow and review the text messages received today for a later and final installment. Especially given that this is the first installment of records since the create date of 9/22/2020. I'd like to get records to her asap.

Requester Name: **Kris Brooks, Constituent**  
Create Date: **9/22/2020 1:23:04 PM**  
Request Status: **Received**  
Due Date: **9/29/2020**  
Reference #: **C064365-092220**

Request Summary: I request all text message records from the Mayor from May 1-sept 20th.

Thank you ~ Kim

<image001.png> Kimberly Ferreiro, CPRO  
Senior Public Disclosure Advisor  
Office of Mayor Jenny A. Durkan  
T: (206) 684.3252 |  
[Kimberly.ferreiro@seattle.gov](mailto:Kimberly.ferreiro@seattle.gov)

*All e-mail correspondence to and from this address is subject to the Washington State Public Records Act, which may result in monitoring, archiving, as well as disclosure to third parties upon request.*

July 2, 2021

BY EMAIL ONLY

Wayne Barnett  
Executive Director  
City of Seattle Ethics and Elections Commission

RE: SEEC Case NO. 21-WBI-0304-1

Dear Mr. Barnett,

Thank you for your diligence in investigating this matter. Pursuant to SMC 4.20.830.E, this is in response to your letter and the attached investigative report authored by Ramsey Ramerman, dated May 6, 2021. Pursuant to SMC 4.20.830.D.3, you and Mr. Ramerman concluded there was "reasonable cause to believe" that there had been Public Records Act ("PRA") violations by Michelle Chen. At all relevant times, Ms. Chen was an Assistant City Attorney assigned by agreement with the City Attorney as Counsel to the Mayor's Office.

I strongly believe that in our Democracy, government works for and must be accountable to the people. Transparency is fundamental to that accountability and the health of our democracy. Indeed, the Public Records Act, an important part of that transparency, was originally passed by voters exercising another fundamental right in 1972 -- a citizen's initiative and vote. Your report was important because it not only reached issues in this specific case but revealed systemic shortcomings in the City's need to maintain, archive and produce public records.

Upon receiving your report, the Mayor's Office response to the SEEC report was threefold: 1) An independent review of the investigation and report conclusions; 2) working with the City Attorney's office, taking remedial steps to review pending and closed PRA requests to ensure responsive documents are produced as required by the PRA, consistent with the report; and 3) to identify and begin implementation of systems to improve the City's work under the PRA, including to ensure the storage, archival, review and production of electronic communications, including text messages.

**Independent Review.** Given that the underlying issue involved interpretation and implementation of the PRA as it applied to PRA requests for my records and to my office, I felt it important that there be an independent review. My office, working with the City Attorney's office, retained Retired Judge Bruce Hilyer to conduct an independent assessment of the investigation and make recommendations to me. His report dated July 1, 2021, is attached here for your reference as Exhibit A. As you will see, Judge Hilyer (Ret.) agrees with Mr. Ramerman's conclusions. I also agree that the underlying actions fell short of the obligations under the PRA. Indeed, no government should be looking to narrowly apply the law. Absent a specific and needed exemption, the presumption should be in favor of production.



**Remedial Steps.** While the report issued in **SEEC Case No. 21-WBI-0304-I** highlighted systemic deficiencies with the public disclosure technology and practices which are being addressed in a larger citywide directive, the City has re-evaluated the specific requests referenced in the report and all closed and currently open request from this time period to ensure appropriate searches are conducted for responsive records. As part of the process, the City Attorney’s Office was consulted for compliance on the Public Records Act. A summary is attached as Exhibit B.

**Systemic Improvements.** The City, like many governments, has struggled to keep up with its obligations under the PRA, given the increase in requests, new communication tools and platforms, and the explosion of electronic records. Over the years there have been a variety of efforts to improve the City’s work, including in the last four years when we added personnel, and consolidated some functions in the Seattle IT Department because of the increasing role of technology in the creation, maintenance, and retrieval of records. Nevertheless, as your report shows, there is work that still needs to be done.

With the sheer volume of records related to the Mayor’s Office, the City is working diligently to address the open records requests by hiring two reviewers, an e-discovery expert, and a public disclosure officer at Seattle IT Department – this position reports to Citywide Public Records Act Program and will continue to consult with the City Attorney’s Office for compliance with the Public Records Act. Public Disclosure Officers have been provided more direct access to locations where records are stored, in order to make it easier for them to fulfill requests.

With the addition of SMARSH, a third-party cloud vendor for text messages, all text messages sent or received since the program was installed for of the Mayor, Deputy Mayors, and Chief of Staff are preserved and can be digitally searched, with the results being provided directly to the Public Disclosure Officers responding to relevant requests.

In addition, I have issued a city-wide directive, attached as Exhibit C, that requires both immediate and long-term solutions to both specific and systemic city-wide deficiencies in our PRA systems and practices. This includes immediate resources for PRA responses, new technology to ensure retention and improve archiving and retrieval of text messages, and a review to make recommendations on some critical questions regarding the City’s PRA functions, including whether functions should be more centralized and whether the city should create an independent cabinet level officer to oversee all city PRA functions. Importantly, the Directive also seeks to improve transparency, accountability, and public trust through the creation of an ongoing PRA Advisory Group comprised of PRA experts, media, technology experts and other stakeholders.

**Personnel Implications.** Finally, I am cognizant that your report may have personnel implications for Ms. Chen. As noted in (Ret.) Judge Hilyer’s report, while Ms. Chen was assigned to the Mayor’s office by MOU, she at all times was, and remains, an employee of the City Attorney. Under the City Charter and Municipal Code, the City Attorney maintains authority over the employment and disciplinary actions for Assistant City Attorneys. This assessment is supported by advice from outside counsel, and our Human Resources Department (HR). The City Attorney has notified our office the MOU that assigned Ms. Chen



to the Mayor's Office will terminate as of August 10, 2021 and confirmed the City Attorney's authority over her employment status. In the event it was determined that the Mayor's Office would be responsible for imposing disciplinary action, we did request a recommendation from Human Resources on the range of appropriate actions for these circumstances. The response from HR, which recommends a written reprimand, additional training, and removal from PRA work, is attached as Exhibit D for your reference. While such employment actions remain under the control of the City Attorney, the Mayor's office can control the scope of duties in the Mayor's office. Consistent with (Ret.) Judge Hilyer's recommendation, for her remaining tenure at the Mayor's Office Ms. Chen will no longer perform functions related to PRA work.

I do want to note that while I agree Ms. Chen's actions here did not comport with the PRA, I believe it would be deeply unfair to define Ms. Chen by these actions. During her tenure, Ms. Chen has provided invaluable work and dedicated service to the City. This is particularly true over the last 16 months of historical challenges for our City. Ms. Chen worked long hours, handling numerous complicated issues related to the pandemic, economic crisis and civil rights reckoning. During the same timeframe you reviewed, she was on call 24/7 as we scrambled to address the burgeoning crisis -- from emergency orders to eviction moratoriums, to lawsuits, to protest responses, to testing and vaccination issues. She did so even though her husband was a frontline doctor at Harborview and even as she faced the same challenges many parents had with young children suddenly "learning from home". More recently, she has had to face and explain to her children how to navigate the very real uptick in anti-Asian hate. Through it all, she kept showing up and working to help the City. Her family can be proud that she demonstrated public service through some of the worst crisis our city has faced.

Again, thank you for your diligence in investigating this matter. Please direct questions or concerns to Senior Deputy Mayor Mike Fong.

Sincerely,

Jenny Durkan  
Mayor

Attachments: Ex. A: Report of Judge Hilyer (Ret.)  
Ex. B: Summary of Remedial Steps  
Ex. C: Mayoral Directive on PRA Changes  
Ex. D: Human Resources Recommendation

CC: City Attorney Pete Holmes  
Michelle Chen

**From:** [Irwin, Stacy](#)  
**To:** [Chen, Michelle](#)  
**Subject:** RE: Moritz PDR 59632 -- ACP Communication  
**Date:** Friday, January 15, 2021 9:51:00 AM  
**Attachments:** [image001.png](#)

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Hi Michelle,

Okay, I will go ahead and close it and use the verbiage you provided. He asked for records until the request is fulfilled, but under the PRA this is called a "standing request" and is not allowed. Requesters can only receive records up to the date of the request, so in this instance it is May 24, 2020 through June 18, 2020 (date of his request). I will let him know this when I close it. If he wants records beyond June 18<sup>th</sup>, he will have to make another request.

Please let me know if you have any other questions and have a great weekend.

Stacy

---

**From:** Chen, Michelle <Michelle.Chen@seattle.gov>  
**Sent:** Thursday, January 14, 2021 5:44 PM  
**To:** Irwin, Stacy <Stacy.Irwin@seattle.gov>  
**Subject:** RE: Moritz PDR 59632 -- ACP Communication

Hi Stacy,

A/C Privilege & Work Product  
A/C Privilege & Work Product

What I

learned was that the new phone was set to 30 days for texts but the setting was changed to Forever after it was discovered. This is why there is a missing range of texts. I can explain more clearly at our next weekly check-in.

I know we have extended 3 times and I don't want to keep extending. I recommend we close it and send this communication with it. By the way, what is the date range? He says 5/24- until request is fulfilled. What would the end date be?

Dear Mr. Moritz,

We do not have any responsive text communications, so we are closing this request at this time. However, if we locate any additional records that are responsive then we will provide them to you.

Thank you,  
Stacy Irwin

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**From:** Irwin, Stacy <[Stacy.Irwin@seattle.gov](mailto:Stacy.Irwin@seattle.gov)>  
**Sent:** Thursday, January 14, 2021 2:34 PM

**To:** Chen, Michelle <[Michelle.Chen@seattle.gov](mailto:Michelle.Chen@seattle.gov)>

**Subject:** Moritz PDR 59632 -- ACP Communication

Hi Michelle – Just checking in with you on this request. Were you able to meet with City Attorney's Office this week regarding the Mayor's texts?

Please let me know.

Thanks - Stacy

Requester Name: **Daniel Moritz-Rabson, Newsweek**

Create Date: **6/18/2020 11:38:11 AM**

Request Status: **Installment**

Due Date: **1/15/21**

Reference #: **C059632-061820**

Request Summary: I am requesting all correspondence (including emails, text messages and call transcripts) from 5/24/2020 until the date this request is fulfilled. I am requesting text of chat communications (SMS, MMS, Skype, Signal, WhatsApp, Facebook Messenger, Instagram, Twitter, WeChat, etc.) between any combination of the following individuals, or on which any two such individuals are among the recipients or senders. This request includes group messages including at least two of these individuals. 1) Mayor Jenny Durkan 2) Police Chief Carmen Best 3) Assistant Chief Thomas Mahaffey



**Stacy Irwin, CPRO**

Senior Public Disclosure Advisor

Office of Mayor Jenny A. Durkan

T: (206) 386 .1251 |

[Stacy.irwin@seattle.gov](mailto:Stacy.irwin@seattle.gov)

October 21, 2022

**Via Email/PDF**

Ms. Susan B. Mindenbergs [[susanmm@msn.com](mailto:susanmm@msn.com)]

LAW OFFICE OF SUSAN B. MINDENBERGS

705 Second Avenue, Suite 1050

Seattle, WA 98104

Mr. Jeffrey L. Needle [[jneedle@wolfenet.com](mailto:jneedle@wolfenet.com); [jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)]

LAW OFFICE OF JEFFREY L. NEEDLE

705 Second Avenue, Suite 1050

Seattle, WA 98104

Re: *Irwin and Ferreiro v. City of Seattle* / KCSC No. 21-2-11739-9 SEA

Dear Ms. Mindenbergs and Mr. Needle:

Enclosed please find a copy of the City's privilege log. An identical version of the log that was provided on October 14, 2022, can be found at pages 1 to 42. Starting at page 43, the log now includes entries for documents that were redacted or withheld in the City's 15<sup>th</sup> production as well as the documents that were inadvertently omitted from the City's initial version of the log.

Please contact me should you have any questions.

Sincerely,



Sarah Gohmann Bigelow

Enclosure



Privilege Log  
 City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Begin/End Dates	Document Date	From	Internal Office Property - Author	Internal Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS 00009661	2/29/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Chen, Michelle <michelle.chen@seattle.gov>				RE: A/C PRIVILEGED - mayor/text messages	RE: A/C PRIVILEGED - mayor/text messages	Yes	Attorney Client/Work Product	Internal email from counsel providing legal advice re: response to public records requests and strategy in anticipation of litigation.
COS 00010984	1/15/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Stacy Ivin <stacy.ivin@gmail.com>			FW: Moritz PDR 59632 - ACP Communication	FW: Moritz PDR 59632 - ACP Communication	Yes	Attorney Client/Work Product	Internal emails to counsel requesting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00011179	2/29/2021	Chen, Michelle <michelle.chen@seattle.gov>		Ferraro, Kimberly <kimberly.ferraro@seattle.gov>   Ivin, Stacy <stacy.ivin@seattle.gov>			A/C PRIVILEGED - mayor/text messages	A/C PRIVILEGED - mayor/text messages	Yes	Attorney Client/Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00011199	1/29/2021	Chen, Michelle <michelle.chen@seattle.gov>		Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Re: 2020CPA-0354, Written Questions - Reply May/10/2020, Mayor's Staffer Formis, and Deputy Mayor Staffer	Re: 2020CPA-0354, Written Questions - Reply May/10/2020, Mayor's Staffer Formis, and Deputy Mayor Staffer	Yes	Attorney Client/Work Product	Internal emails to and from counsel requesting and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests and reflecting attorney mental impressions and strategy in anticipation of litigation.	
COS 00009662	2/29/2021	Ivin, Stacy <stacy.ivin@seattle.gov>		Chen, Michelle <michelle.chen@seattle.gov>   Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: A/C PRIVILEGED - mayor/text messages	RE: A/C PRIVILEGED - mayor/text messages	Yes	Attorney Client/Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00010794	2/29/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Ivin, Stacy <stacy.ivin@seattle.gov>			FW: A/C PRIVILEGED - mayor/text messages	FW: A/C PRIVILEGED - mayor/text messages	Yes	Attorney Client/Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00009663	2/29/2021	Chen, Michelle <michelle.chen@seattle.gov>		Chen, Michelle <michelle.chen@seattle.gov>			RE: Schwartz # 64122 Lvl Review	RE: Schwartz # 64122 Lvl Review	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.	
COS 00010933	1/19/2021	Nadelman, Jessica <jessica.nadelman@seattle.gov>		Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: A/C Internal Phone Lists	RE: A/C Internal Phone Lists	Yes	Attorney Client/Work Product	Internal emails to and from counsel requesting and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00010934	1/19/2021	Ivin, Stacy <stacy.ivin@seattle.gov>		Nadelman, Jessica <jessica.nadelman@seattle.gov>			RE: A/C Internal Phone Lists	RE: A/C Internal Phone Lists	Yes	Attorney Client/Work Product	Internal emails to and from counsel requesting and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00010795	2/29/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Ivin, Stacy <stacy.ivin@seattle.gov>			FW: Brooks PDR 64654 -- For your review	FW: Brooks PDR 64654 -- For your review	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.	
COS 00011232	3/5/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Ivin, Stacy <stacy.ivin@seattle.gov>			FW: Brooks #64395	FW: Brooks #64395	Yes	Attorney Client	Internal emails from counsel providing legal advice re: response to public records requests.	
COS 00010988	3/3/2021	Joseph Goshong <jgoshong@seattle.gov>		Joseph Goshong <jgoshong@seattle.gov>			FW: **** A/C ****	FW: **** A/C ****	Yes	Attorney Client/Work Product	Memorandum prepared by and under the direction of counsel providing legal advice, to counsel seeking legal advice, and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS 00010993	9/25/2020	Chen, Michelle <michelle.chen@seattle.gov>		Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			FW: Brooks PDR 64365 -- For Review - A/C Communication	FW: Brooks PDR 64365 -- For Review - A/C Communication	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.	
COS 00009715	2/23/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Nadelman, Jessica <jessica.nadelman@seattle.gov>			FW: Moritz PDR 59632 - ACP Communication	FW: Moritz PDR 59632 - ACP Communication	Yes	Attorney Client/Work Product	Internal email to counsel seeking and reflecting legal advice re: response to public records requests.	
COS 00010950	1/15/2021	Ferraro, Kimberly, MOS, MA110 <kimberly.mos.ma110@seattle.gov>		Chen, Michelle <michelle.chen@seattle.gov>			****A/C**** Elean Text Draft	****A/C**** Elean Text Draft	Yes	Attorney Client	Internal email to counsel seeking and reflecting legal advice re: response to public records requests.	
COS 00011400	7/24/2020	Vela, Aaron <aaron.vela@seattle.gov>		Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: Making "A/C"...	RE: Making "A/C"...	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.	

Privilege Log  
 City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00010915	COS_00010916	2/2/2021	Ferrero, MOS, MA110' <kimberly.mos.ma110@seattle.gov>			Ivin, Stacy' <stacy.livn@seattle.gov>			Fw: DuLaCruz PDR 63727 -- For Your Review	Fw: DuLaCruz PDR 63727 -- For Your Review	Yes	Attorney Client / Work Product	Internal emails to and from counsel requesting and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00008190		3/30/2021		Boyes, Carolyn	Chen, Michelle					Training for MO FINAL.docx		Attorney Client	Memorandum providing legal advice re: scope of public records under Washington Public Records Act.
COS_00010937	COS_00010939	2/2/2021	stacy.livn <stacy.livn@gmail.com>			Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			Re: Fw: DuLaCruz PDR 63727 -- For Your Review	Re: Fw: DuLaCruz PDR 63727 -- For Your Review	Yes	Attorney Client / Work Product	Internal emails to and from counsel requesting and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010941		9/25/2020		Aloncastro, Regi	Ferrero, Kimberly					Timeline of Mayor Phone Replacement and Text Messages - revised.docx		Attorney Client / Work Product	Memorandum prepared by and under the direction of counsel providing legal advice, to counsel providing legal advice, and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010957	COS_00010960	1/18/2020	Chen, Michelle' <michelle.chen@seattle.gov>			Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			RE: ""AC Text Search Results	RE: ""AC Text Search Results	Yes	Attorney Client / Work Product	Internal emails from and to counsel providing and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009834	COS_00009835	2/2/2021	Chen, Michelle' <michelle.chen@seattle.gov>			Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			Fw: DuLaCruz PDR 63727 -- For Your Review	Fw: DuLaCruz PDR 63727 -- For Your Review	Yes	Attorney Client	Internal email from counsel for purposes of providing legal advice pertaining to public records requests.
COS_00010967	COS_00010968	1/29/2021	Chen, Michelle' <michelle.chen@seattle.gov>			Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			Re: 2020OPA-0354, Written Questions - Deputy Mayor Forng, Chair of Staff Forums, and Deputy Mayor Skinner	Re: 2020OPA-0354, Written Questions - Deputy Mayor Forng, Chair of Staff Forums, and Deputy Mayor Skinner	Yes	Attorney Client / Work Product	Internal email from counsel providing and directing information gathering in anticipation of litigation re: response to public records requests.
COS_00010969		2/9/2021	Chen, Michelle' <michelle.chen@seattle.gov>			Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			AC PRIVILEGED - mayor text messages	AC PRIVILEGED - mayor text messages		Attorney Client / Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010970	COS_00010971	2/2/2021	Ferrero, Kimberly' <kimberly.mos.ma110@seattle.gov>			stacy.livn <stacy.livn@gmail.com>			Fw: DuLaCruz PDR 63727 -- For Your Review	Fw: DuLaCruz PDR 63727 -- For Your Review	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00011465	COS_00011467	3/4/2021	Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			Garret and Kim Ferrero <kmferrero@yahoo.com>			Fwd: Brooks #64365	Fwd: Brooks #64365	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010901		2/9/2021	Ivin, Stacy' <stacy.livn@seattle.gov>			Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			RE: AC PRIVILEGED - mayor text messages	RE: AC PRIVILEGED - mayor text messages	Yes	Attorney Client / Work Product	Internal emails to and from counsel requesting and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010972	COS_00010974	2/2/2021	Ferrero, MOS, MA110' <kimberly.mos.ma110@seattle.gov>			stacy.livn <stacy.livn@gmail.com>			RE: Fw: DuLaCruz PDR 63727 -- For Your Review	RE: Fw: DuLaCruz PDR 63727 -- For Your Review	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and providing legal advice re: response to public records requests.
COS_00009728	COS_00009729	3/9/2021	Ferrero, MOS, MA110' <kimberly.mos.ma110@seattle.gov>			Chen, Michelle' <michelle.chen@seattle.gov>			RE: Brooks Appeal # 64365	RE: Brooks Appeal # 64365	Yes	Attorney Client / Work Product	Internal email reflecting legal advice re: response to public records requests and attaching a document reflecting attorney mental impressions and strategy in anticipation of litigation.
COS_00010935		2/28/2021	Ferrero, MOS, MA110' <kimberly.mos.ma110@seattle.gov>			Ivin, Stacy' <stacy.livn@seattle.gov>			[redacted]	[redacted]	Yes	Attorney Client / Work Product	Memorandum from counsel to counsel providing and seeking legal advice re: response to public records requests and reflecting attorney mental impressions and strategy in anticipation of litigation.
COS_00010936		9/25/2020		Aloncastro, Regi	Ivin, Stacy'					[redacted]		Attorney Client / Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010902	COS_00010903	2/9/2021	Ferrero, Kimberly, MOS, MA110' <kimberly.mos.ma110@seattle.gov>			Ivin, Stacy' <stacy.livn@seattle.gov>			RE: AC PRIVILEGED - mayor text messages	RE: AC PRIVILEGED - mayor text messages	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.

City of Seattle  
 City Productions 1-10, 12  
 In/In, et al v. City of Seattle  
 KOSC No. 21-2-17739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00009562		2/29/2021	'Chen, Michele' <michelle.chen@seattle.gov>			'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>   'Ivins, Stacy' <stacy.ivins@seattle.gov>			AC PRIVILEGED - mayor text messages	AC PRIVILEGED - mayor text messages		Attorney Client Work Product	Internal email from counsel providing legal advice re: response to public records requests and strategy in anticipation of litigation.
COS_00010919	COS_00010921	1/22/2020	'Ferrero, Kimberly, MOS, MA110' <kimberly_mos_ma110@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			FW: "" AC ""	FW: "" AC ""	Yes	Attorney Client Work Product	Internal email from and to counsel providing and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010923		2/9/2021	'Ferrero, Kimberly, MOS, MA110' <kimberly_mos_ma110@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			FW: AC PRIVILEGED - mayor text messages	FW: AC PRIVILEGED - mayor text messages	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00011089		[3/30/2021]		Joseph Greshong	Greshong, Joseph					(L) Hold - Other Hold - Verification Form- (M) Other Attachment docs		Attorney Client Work Product	Memorandum from counsel to counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00011113		9/29/2020		Amestrisio, Raj	Ivins, Stacy					Timeline of Mayor Phone Replacement and Text Messages - revised.docx		Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009589	COS_00009591	1/28/2021	'Chen, Michele' <michelle.chen@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			Re: DelaCruz PDR 63727 -- For Your Review -- AC Communication	Re: DelaCruz PDR 63727 -- For Your Review -- AC Communication	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010906		2/9/2021	'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			FW: AC PRIVILEGED - mayor text messages	FW: AC PRIVILEGED - mayor text messages	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010976		2/9/2021	'Chen, Michele' <michelle.chen@seattle.gov>			'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>   'Ivins, Stacy' <stacy.ivins@seattle.gov>			AC PRIVILEGED - mayor text messages	AC PRIVILEGED - mayor text messages	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010977	COS_00010978	1/29/2021	'Chen, Michele' <michelle.chen@seattle.gov>			'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			Re: 2020QA-0354, Written Questions - Deputy Mayor Form, Chief of Staff, Forms, and Deputy Mayor, Skiller	Re: 2020QA-0354, Written Questions - Deputy Mayor Form, Chief of Staff, Forms, and Deputy Mayor, Skiller	Yes	Attorney Client	Internal email reflecting legal advice from counsel re: response to public records requests and notice to third party re: disclosure of private information.
COS_00009592	COS_00009594	1/28/2021	'Chen, Michele' <michelle.chen@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			Re: DelaCruz PDR 63727 -- For Your Review -- AC Communication	Re: DelaCruz PDR 63727 -- For Your Review -- AC Communication	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009573	COS_00009574	2/23/2021	'Chen, Michele' <michelle.chen@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			RE Brooks PDR 64385 -- For Review - AC Communication	RE Brooks PDR 64385 -- For Review - AC Communication	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00011115	COS_00011116	1/15/2021	'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			'Nadelman, Jessica' <jessica.nadelman@seattle.gov>			FW: Moritz PDR 59632 - ACP Communication	FW: Moritz PDR 59632 - ACP Communication	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010924	COS_00010926	1/27/2020	'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			FW: "" AC ""	FW: "" AC ""	Yes	Attorney Client Work Product	Internal email from and to counsel providing and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00010927	COS_00010928	2/22/2021	'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			'Ivins, Stacy' <stacy.ivins@seattle.gov>			FW: DelaCruz PDR 63727 -- For Your Review	FW: DelaCruz PDR 63727 -- For Your Review	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009518	COS_00009519	1/14/2021	'Ivins, Stacy' <stacy.ivins@seattle.gov>			'Chen, Michele' <michelle.chen@seattle.gov>			Re: Moritz PDR 59632 -- ACP Communication	Re: Moritz PDR 59632 -- ACP Communication	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009418	COS_00009419	11/10/2020	'Ivins, Stacy' <stacy.ivins@seattle.gov>			'Chen, Michele' <michelle.chen@seattle.gov>   'Yanik, Emmanuel' <emmanuel.yanik@seattle.gov>   'O'Reilly, Bernar, Colleen' <colleen.oreilly@seattle.gov>			Missagna PDR 60767 -- For MC Review - Still needs review	Missagna PDR 60767 -- For MC Review - Still needs review	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009525	COS_00009526	8/26/2020	'Ferrero, Kimberly' <kimberly.ferrero@seattle.gov>			'Chen, Michele' <michelle.chen@seattle.gov>			RE: Automatic reply: iPhone	RE: Automatic reply: iPhone	Yes	Attorney Client Work Product	Internal email from and from counsel providing legal advice re: response to public records requests and reflecting attorney mental impressions and strategy in anticipation of litigation.

City Productions 1-10, 12  
*In/n/v, et al v. City of Seattle*  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	To	Property - Author	Property - Author	Last Author Saved By	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00005985	COS_00009087	9/30/2020	<Ferro, Kimberly> <kimberly.ferro@seattle.gov>	<Chen, Michelle> <michelle.chen@seattle.gov>	Rramema					RE: MO PDR	RE:MO PDR	Yes	Attorney Client	Internal email to counsel seeking legal advice re: Memorandum reflecting legal advice re: response to public records requests.
COS_00012118	COS_00012130	5/6/2021									SEEC report final.pdf	Yes	Attorney Client	Internal email chain with counsel seeking and providing legal advice in anticipation of litigation re: communications about HR matters.
COS_00005953	COS_00005954	2/27/2020	<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>	<Camille Jones@seattle.gov>						RE: Mayor's Office Postings - A/C PRIVILEGED	RE: Mayor's Office Postings - A/C PRIVILEGED	Yes	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and attaching documents for purpose of seeking legal advice and in anticipation of litigation re: HR matters.
COS_00005383		2/4/2020	<Jones, Camille> <camille.jones@seattle.gov>	<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>						Fwd: A/C PRIVILEGED	Fwd: A/C PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and in anticipation of litigation re: HR matters.
COS_V2_00014185	COS_V2_00014185	2/28/2020	<Jones, Camille> <camille.jones@seattle.gov>	<Chen, Michelle> <michelle.chen@seattle.gov>						RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and in anticipation of litigation re: HR matters.
COS_00005564	COS_00005569	2/17/2021	<Michelle.chen@seattle.gov>	<span.aici@seattle.gov>						Re: Diet Job Postings - A/C PRIVILEGED	Re: Diet Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_00011505	COS_00011508	4/23/2021	<Chen, Michelle> <michelle.chen@seattle.gov>	<Fong, Michael> <michael.fong@seattle.gov>						FW: Follow-up questions - time sensitive	FW: Follow-up questions - time sensitive	Yes	Attorney Client   Work Product	Internal emails with counsel requesting and reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: public records requests.
COS_00011510		10/6/2020			Ampicastro, Raj	Chen, Michelle					Timeline of Mayor Phone Replacement and Text Messages - 10/1 2020.docx		Attorney Client   Work Product	Internal email from counsel to counsel seeking and reflecting attorney mental impressions and strategy in anticipation of litigation re: public records requests.
COS_00011609		10/6/2020									text messages A_C PRIVILEGED.pdf	Yes	Attorney Client   Work Product	Internal email from counsel providing legal advice re: response to public records requests and application of administrative process (see...)
COS_00009413	COS_00009414	1/24/2020	<Michelle.chen@seattle.gov>	<Ferro, Kimberly> <kimberly.ferro@seattle.gov>						Fwd: 1:1 Meeting Today	Fwd: 1:1 Meeting Today	Yes	Attorney Client	Internal email to counsel seeking legal advice re: response to public records requests.
COS_00009111		10/5/2020	<Chen, Michelle> <michelle.chen@seattle.gov>	<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>						***A/C*** Moritz-Rabson PRR Review	***A/C*** Moritz-Rabson PRR Review	Yes	Attorney Client	Internal email to counsel providing attorney mental impressions in anticipation of litigation re: HR matters.
COS_V2_00014192	COS_V2_00014192	2/28/2020	<Jones, Camille> <camille.jones@seattle.gov>	<Fong, Michael> <michael.fong@seattle.gov>						RE: A/C Privilege - RE: Vacation Time	RE: A/C Privilege - RE: Vacation Time	Yes	Work Product	Internal email reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: public records requests as well as pending litigation.
COS_00011617	COS_00011622	5/5/2021	<Chen, Michelle> <michelle.chen@seattle.gov>	<Fornas, Stephanie> <stephanie.fornas@seattle.gov>						FW: Response to SEEC Investigation	FW: Response to SEEC Investigation	Yes	Attorney Client   Work Product	Internal email reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS_00011625	COS_00011626	12/2/2021									RE: _____ A.C. _____ update on forensic 12.2.2020.pdf	Yes	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS_00005570	COS_00005575	2/17/2021	<Chen, Michelle> <michelle.chen@seattle.gov>	<Jones, Camille> <camille.jones@seattle.gov>						Re: Diet Job Postings - A/C PRIVILEGED	Re: Diet Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS_V2_00014341	COS_V2_00014341	3/10/2021	<Chen, Michelle> <michelle.chen@seattle.gov>	<Jones, Camille> <camille.jones@seattle.gov>						RE: FMLA A/C PRIVILEGE - draft response	RE: FMLA A/C PRIVILEGE - draft response	Yes	Work Product	Internal email providing attorney mental impressions in anticipation of litigation re: HR matters.
COS_00005460		2/14/2020	<Chen, Michelle> <michelle.chen@seattle.gov>	<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>						Re: A/C Privilege - Timeline & Talking Points for PIO Restructure - updated	Re: A/C Privilege - Timeline & Talking Points for PIO Restructure - updated		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00005373		1/30/2020	<Jones, Camille> <camille.jones@seattle.gov>	<Chen, Michelle> <michelle.chen@seattle.gov>						RE: A/C Privilege - next steps (w/in, please review)	RE: A/C Privilege - next steps (w/in, please review)		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_V2_00014383	COS_V2_00014383	3/11/2021	<Jones, Camille> <camille.jones@seattle.gov>	<Ferro, Kimberly> <kimberly.ferro@seattle.gov>						AC Privilege - FW: My Thoughts	AC Privilege - FW: My Thoughts	Yes	Attorney Client   Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00009719	COS_00009721	3/4/2021	<Chen, Michelle> <michelle.chen@seattle.gov>							Re: Brooks #64395	Re: Brooks #64395	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.

Privilege Log  
 City Productions 1-10, 12  
 In/In, et al v. City of Seattle  
 KOSC No. 21-2-17739-9 SEA

BagBates	EndBates	Document Date	From	[Media] Office Property - Author	[Media] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Media] File Name	Redactions?	Privilege Type	Privilege Description
COS 0000953	COS 0000955	9/23/2020	<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov>			<Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>	<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov>		RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email with counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.
COS 00009461	COS 00005466	2/18/2020	<Jones, Camille> <camille.jones@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		RE: A/C Privilege - [redacted]	RE: A/C Privilege - [redacted]	Yes	Work Product	Internal email with counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.	
COS 00005426		2/7/2020	<Jones, Camille> <camille.jones@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		AC Privilege- talking points	AC Privilege- talking points		Work Product	Internal email with counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.	
COS 00005427		12/7/2020		Jones, Camille	Jones, Camille				Talking points In/In, Ferreiro Meeting docx		Work Product	Internal email with counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.	
COS 00009098	COS 00009090	9/30/2020	<Chen, Michelle> <michelle.chen@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov>		AC Privilege - RE: Vacation Time	AC Privilege - RE: Vacation Time	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.	
COS VZ 00014199	COS VZ 0001420	2/28/2020	<Jones, Camille> <camille.jones@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		RE: In/In, Stacy is inviting you to collaborate on install 5_4d011 - A/C Privilege Communication	RE: In/In, Stacy is inviting you to collaborate on install 5_4d011 - A/C Privilege Communication	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.	
COS 00006378	COS 00008381	1/23/2020	<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov>			<In/In, Stacy> <stacy.inwin@seattle.gov>		RE: ""A/C"" Public Record Review Request	RE: ""A/C"" Public Record Review Request	Yes	Work Product	Internal email to counsel seeking legal advice re: response to public records requests.	
COS 00009391	COS 00009392	9/30/2020	<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov>			<Chen, Michelle> <michelle.chen@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov>		RE: A/C Privilege- Letter + Talking Points - updated, please review	RE: A/C Privilege- Letter + Talking Points - updated, please review	Yes	Work Product	Internal email to counsel seeking legal advice and attaching documents for the purpose of seeking legal advice re: HR matters.	
COS 00005274		1/14/2020	<Jones, Camille> <camille.jones@seattle.gov>			<Olsen, Paul> <paul.olsen@seattle.gov>		RE: A/C Privilege- Letter + Talking Points - updated, please review	RE: A/C Privilege- Letter + Talking Points - updated, please review	Yes	Work Product	Internal email to counsel seeking legal advice and attaching documents for the purpose of seeking legal advice re: HR matters.	
COS 00009275		1/14/2020		Thompson, Myrum	Jones, Camille				In/In, Letter, updated 1/23/2020 docx		Work Product	Internal email from counsel reflecting legal advice pertaining to public records requests.	
COS 00005276		1/14/2020		Thompson, Myrum	Jones, Camille				In/In, Letter, updated 1/23/2020 docx		Work Product	Internal email from counsel reflecting legal advice pertaining to public records requests.	
COS VZ 00014344	COS VZ 0001434	3/4/2021	<Chen, Michelle> <michelle.chen@seattle.gov>			<Jones, Camille> <camille.jones@seattle.gov>		RE: ACP	RE: ACP	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.	
COS 00005253	COS 00005258	2/17/2020	<Chen, Michelle> <michelle.chen@seattle.gov>			<In/In, Stacy> <stacy.inwin@seattle.gov>		RE: Draft Job Postings - A/C PRIVILEGED	RE: Draft Job Postings - A/C PRIVILEGED	Yes	Work Product	Internal email to counsel seeking legal advice and providing legal advice and reflecting legal advice and mental impressions of attorney in anticipation of litigation re: response to public records requests.	
COS 00009404	COS 00009405	12/22/2020	<Chen, Michelle> <michelle.chen@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov>		RE: ""A/C""	RE: ""A/C""	Yes	Work Product	Internal email from counsel providing legal advice re: response to public records requests and solicitation of deliberative process (att...)	
COS 00005361	COS 00005362	1/24/2020	<In/In, Stacy> <stacy.inwin@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		RE: 111 Meeting Today	RE: 111 Meeting Today	Yes	Work Product	Internal email reflecting attorney mental impressions and planning in anticipation of litigation re: response to public records requests.	
COS 00009276		9/11/2020	<Chen, Michelle> <michelle.chen@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		RE: Mayor's Personal Text Messages...	RE: Mayor's Personal Text Messages...		Work Product	Internal email to counsel seeking legal advice re: HR matters.	
COS 00005400		2/4/2020	<Jones, Camille> <camille.jones@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		AC Privilege - Timeline for PIO Restructure, please review by 2/5	AC Privilege - Timeline for PIO Restructure, please review by 2/5	Yes	Work Product	Internal email reflecting and relying legal advice in anticipation of litigation re: response to public records requests.	
COS 00011611	COS 00011612	4/27/2021		Ramsay, Ramerman	Ramsay, Ramerman				AC Privilege - Timeline for PIO Restructure, please review by 2/5	AC Privilege - Timeline for PIO Restructure, please review by 2/5	Yes	Work Product	Internal email reflecting and relying legal advice in anticipation of litigation re: response to public records requests.
COS 0000927	COS 0000928	8/26/2020	<Chen, Michelle> <michelle.chen@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov> <Valenciano, Rogi> <rogi.valenciano@seattle.gov> <Chen, Michelle> <michelle.chen@seattle.gov> <O'Reilly Berner, Colleen> <colleen.oreillyberner@seattle.gov>		RE: Automatic reply: iPhone	RE: Automatic reply: iPhone	Yes	Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and planning in anticipation of litigation re: response to public records requests.	
COS VZ 00014327		11/18/2020	<Chen, Michelle> <michelle.chen@seattle.gov>			<Ferreiro, Kimberly> <kimberly.ferreiro@seattle.gov>		RE: December Vacation Request	RE: December Vacation Request	Yes	Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and planning in anticipation of litigation re: response to public records requests.	

Privilege Log  
City Productions 1-10, 12  
In/In, et al v. City of Seattle  
KOSC No. 21-2-11739-9 SEA

Begin/End Dates	Document Date	From	Medial Office Property - Author	Medial Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00005472	2/17/2020	Chen, Michele <michele.chen@seattle.gov>			"Ind, Pam" <pam.riochi@seattle.gov>	"Jones, Camille" <camille.jones@seattle.gov>		RE: Draft Job Postings - A/C PRIVILEGED	RE: Draft Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_00005401	2/5/2020	"Jones, Camille" <camille.jones@seattle.gov>			"Michele, Chen" <michele.chen@seattle.gov>	"Wilkinson, Zahraa" <zahraa.wilkinson@seattle.gov>		RE: A/C Privilege - Timeline for PIO Restructure, please review by 2/5	RE: A/C Privilege - Timeline for PIO Restructure, please review by 2/5		Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00009207	9/22/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Chen, Michele" <michele.chen@seattle.gov>	"A/C**** Text"		***A/C**** Text	***A/C**** Text		Work Product	Internal email to counsel seeking legal advice re: public records requests.
COS_00005577	2/17/2020	"Jones, Camille" <camille.jones@seattle.gov>			"Michele, Chen" <michele.chen@seattle.gov>	"Chen, Michele" <michele.chen@seattle.gov>		RE: Draft Job Postings - A/C PRIVILEGED	RE: Draft Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_00005702	3/6/2020	"Jones, Camille" <camille.jones@seattle.gov>			"Ind, Pam" <pam.riochi@seattle.gov>	"Chen, Michele" <michele.chen@seattle.gov>		AC Privilege - Talking Point SPD Opportunities	AC Privilege - Talking Point SPD Opportunities		Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_V2_00014596	7/8/2021	"Formas, Stephanie" <stephanie.formas@seattle.gov>			"Jones, Camille" <camille.jones@seattle.gov>		RE: A/C Privilege - RE: Vacation Time	RE: A/C Privilege - RE: Vacation Time	Yes	Work Product	Internal email to counsel seeking legal advice re: public records requests.	
COS_00011492	3/5/2021	"Formas, Stephanie" <stephanie.formas@seattle.gov>			"Chen, Michele" <michele.chen@seattle.gov>		RE: Brooks Appeal # 64365	RE: Brooks Appeal # 64365	Yes	Attorney Client	Internal email to counsel seeking legal advice and from counsel for the purpose of providing legal advice re: response to public records requests.	
COS_00009093	9/30/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Alonso, Regi" <regi.alonso@seattle.gov>		RE: MO PDR	RE: MO PDR	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS_00013353	5/13/2021	"Chen, Michele" <michele.chen@seattle.gov>			"Alonso, Regi" <regi.alonso@seattle.gov>		RE: Litigation Request	RE: Litigation Request		Attorney Client	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.	
COS_00013354	10/6/2020		Alonso, Regi	Chen, Michele				Timeline of Mayor Proulx Resignment and Trans.MESSAGES -10.01.2020.docx			Attorney Client	Internal email to counsel seeking legal advice and from counsel providing attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS_V2_00014206	2/28/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Jones, Camille" <camille.jones@seattle.gov>		RE: A/C Privilege - RE: Vacation Time	RE: A/C Privilege - RE: Vacation Time	Yes	Work Product	Internal email to counsel seeking legal advice re: public records requests.	
COS_00009349	11/5/2020	"Ferreiro, Kimberly" <kimberly.ferreiro@seattle.gov>			"Chen, Michele" <michele.chen@seattle.gov>		RE: **A/C**Hinko Text Search Results	RE: **A/C**Hinko Text Search Results	Yes	Attorney Client	Internal email to counsel seeking legal advice re: public records requests.	
COS_00009001	9/10/2020	"Ferreiro, Kimberly" <kimberly.ferreiro@seattle.gov>			"Chen, Michele" <michele.chen@seattle.gov>		F/W: Pace PDR No. 59220 - For your review - A/C Communication	F/W: Pace PDR No. 59220 - For your review - A/C Communication	Yes	Attorney Client	Internal email to counsel seeking legal advice re: public records requests.	
COS_00005402	2/4/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Jones, Camille" <camille.jones@seattle.gov>		RE: A/C Privilege - Timeline for PIO Restructure, please review by 2/5	RE: A/C Privilege - Timeline for PIO Restructure, please review by 2/5		Attorney Client	Internal email with counsel seeking legal advice re: HR matters.	
COS_00005638	2/27/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Jones, Camille" <camille.jones@seattle.gov>		RE: Mayor's Office Positions - A/C PRIVILEGED	RE: Mayor's Office Positions - A/C PRIVILEGED	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_00005832	1/23/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Jones, Camille" <camille.jones@seattle.gov>		RE: Timon, Stacy is making you to collaborate on instail 5_44011 - A/C Privilege Communication	RE: Timon, Stacy is making you to collaborate on instail 5_44011 - A/C Privilege Communication	Yes	Attorney Client	Internal email from counsel providing legal advice re: public records requests.	
COS_00005533	2/17/2020	"Jones, Camille" <camille.jones@seattle.gov>			"Jones, Camille" <camille.jones@seattle.gov>	"Friedhoff, Aaron" <aaron.friedhoff@seattle.gov>		RE: Draft Job Postings - A/C PRIVILEGED	RE: Draft Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_00005460	1/23/2020	"Chen, Michele" <michele.chen@seattle.gov>			"Chen, Michele" <michele.chen@seattle.gov>	"Friedhoff, Aaron" <aaron.friedhoff@seattle.gov>		RE: Timon, Stacy is making you to collaborate on instail 5_44011 - A/C Privilege Communication	RE: Timon, Stacy is making you to collaborate on instail 5_44011 - A/C Privilege Communication	Yes	Attorney Client	Internal email from counsel providing legal advice re: public records requests.

Privilege Log  
 City Productions 1-10, 12  
 In/with, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS 00009826	COS 00009829	15/5/2021		Chen, Michelle					Response to Mr. Reimann 6/4/2021.pdf	Response to Mr. Reimann 6/4/2021.pdf	Yes	Attorney-Client Work Product	Document reflecting legal advice re: public records requests.
COS 00009831	COS 00009849	21/1/2021		Chen, Michelle					Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice regarding HR matters.
COS 00009843	COS 00009861	2/28/2020	Chen, Michelle						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice regarding HR matters.
COS 00009859	COS 00009901	1/28/2021	Chen, Michelle						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00009913	COS 00009114	10/5/2020	Ferreiro, Kimberly						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00009923	COS 00009425	1/27/2020	Ferreiro, Kimberly						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00009942	COS 00009042	9/23/2020	Ferreiro, Kimberly						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00014142	COS 00014142	2/27/2020	Wilkinson, Zahraa						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00014154	COS 00014154	2/10/2020	Wilkinson, Zahraa						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00005586	COS 00005591	2/17/2021	Michelle.chen@seattle.gov						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00022064	COS 00022064	2/10/2020	Jones, Camille						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00005431		9/10/2020	Jones, Camille						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00014223	COS 00014223	2/27/2020	Jones, Camille						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00005892	COS 00005897	2/17/2020	Chen, Michelle						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00009820	COS 00009821	1/14/2021	Chen, Michelle						Request	Request	Yes	Attorney-Client Work Product	Internal email to counsel seeking legal advice re: HR matters.

Privilege Log  
 City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Bag Bates	End Bates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
COS_V2_00023072	COS_V2_0002307	2/28/2020	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Wilkinson, Zahraa	Wilkinson, Zahraa	Chen, Michelle <michelle.chen@seattle.gov>   Fornas, Stephanie <stephanie.fornas@seattle.gov>			RE: AC Privilege - RE: Vacation Time	RE: AC Privilege - RE: Vacation Time	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00009098		9/30/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			***AC*** Public Record Review Request	***AC*** Public Record Review Request	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice re: response to public records requests.
COS_00009408	COS_00009408	1/22/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: ***AC***	RE: ***AC***	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice re: response to public records requests.
COS_00009343		9/23/2020	Chen, Michelle <michelle.chen@seattle.gov>			'O'Reilly, Bernar, Colleen' <colleen.o'reilly@seattle.gov>			AC PRIVILEGED	AC PRIVILEGED	Yes	Work Product	Internal email from counsel reflecting mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009730	COS_00009731	3/8/2021	Chen, Michelle <michelle.chen@seattle.gov>			Ferrero, Kimberly <kimberly.ferrero@seattle.gov>   Chen, Michelle <michelle.chen@seattle.gov>   Ivin, Stacy <stacy.ivin@seattle.gov>			RE: Brooks Appeal # 64965	RE: Brooks Appeal # 64965	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_V2_00014156	COS_V2_0001415	2/12/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>   Ivin, Stacy <stacy.ivin@seattle.gov>			RE: AC Privilege	RE: AC Privilege	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009133	COS_00009134	10/7/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Ivin, Stacy <stacy.ivin@seattle.gov>			RE: ***AC*** Montiz-Rabson PRR Review	RE: ***AC*** Montiz-Rabson PRR Review	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009450	COS_00009451	12/16/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ivin, Stacy <stacy.ivin@seattle.gov>			RE: Beakman PDR 60951 - For Your Review	RE: Beakman PDR 60951 - For Your Review	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009044		9/23/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Alencastro, Rogi <rogi.alencastro@seattle.gov>   Ivin, Stacy <stacy.ivin@seattle.gov>			***AC*** Phone	***AC*** Phone	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice re: response to public records requests and seeking legal advice in anticipation of litigation re: HR matters.
COS_00009344	COS_00009347	1/23/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED	Yes	Attorney Client Work Product	Internal email from counsel providing and reflecting legal advice in anticipation of litigation re: response to public records requests.
COS_00009411	COS_00009412	1/22/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			RE: ***AC***	RE: ***AC***	Yes	Attorney Client Work Product	Internal email from and to counsel providing and reflecting legal advice in anticipation of litigation re: response to public records requests.
COS_00009071		9/29/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Timeline of Major Phone Replacement and Text Messages AC PRIVILEGED	RE: Timeline of Major Phone Replacement and Text Messages AC PRIVILEGED		Attorney Client Work Product	Internal email from and to counsel providing and reflecting legal advice in anticipation of litigation re: response to public records requests.
COS_00009028	COS_00009029	9/22/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			RE: Wednesday's Plan	RE: Wednesday's Plan	Yes	Work Product Attorney Client Work Product	Internal email to and from counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009351	COS_00009354	11/18/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: ***AC Text Search Results	RE: ***AC Text Search Results	Yes	Attorney Client Work Product	Internal email from and to counsel seeking and providing legal advice in anticipation of litigation re: response to public records requests.
COS_00009712		3/6/2020	Chen, Michelle <michelle.chen@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Re: AC Privilege - Talking Point SPD Opportunities	Re: AC Privilege - Talking Point SPD Opportunities	Yes	Attorney Client Work Product	Internal email from and to counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00009308		9/18/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			***AC*** New PDR	***AC*** New PDR	Yes	Attorney Client	Internal email to counsel seeking legal advice re: response to public records requests.
COS_V2_00014230	COS_V2_000142	2/27/2020	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>   Fornas, Stephanie <stephanie.fornas@seattle.gov>			RE: AC PRIVILEGED	RE: AC PRIVILEGED	Yes	Attorney Client Work Product	Internal email from and to counsel providing and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00009574		12/27/2020	Wilkinson, Zahraa		Wilkinson, Zahraa	Chen, Michelle <michelle.chen@seattle.gov>			2.27.20 DRAFT Ivin separation agreement attorney client privilege dox	2.27.20 DRAFT Ivin separation agreement attorney client privilege dox		Attorney Client Work Product	Internal email from and to counsel providing and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00012393	COS_00012389	5/5/2021	Chen, Michelle <michelle.chen@seattle.gov>			Fornas, Stephanie <stephanie.fornas@seattle.gov>			PIV: Response to SEEC Investigation	PIV: Response to SEEC Investigation	Yes	Attorney Client Work Product	Internal email reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.



City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BugBases	EndDates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00009732	COS_00009733	3/8/2021	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Brooks Appeal # 64365	RE: Brooks Appeal # 64365	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: response to public records requests.
COS_V2_00014236	COS_V2_00014236	2/28/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: AC Privilege - RE: Vacation Time	RE: AC Privilege - RE: Vacation Time	Yes	Attorney Client Work Product	Internal email chain to and from counsel seeking and providing legal advice in anticipation of litigation re: response to public records requests.
COS_00009595	COS_00009596	11/5/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: ""AC Hitako Text Search Results	RE: ""AC Hitako Text Search Results	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: response to public records requests.
COS_V2_00014099	COS_V2_00014116	2/6/2020	Chen, Michelle <michelle.chen@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			FW: Performance Review Rebuttal - AC PRIVILEGED	FW: Performance Review Rebuttal - AC PRIVILEGED	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_00009115	COS_00009116	10/5/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: ""AC"" Text Question	RE: ""AC"" Text Question	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: response to public records requests.
COS_00009503	COS_00009506	2/17/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Draft Job Postings - AC PRIVILEGED	RE: Draft Job Postings - AC PRIVILEGED	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_00009548	COS_00009551	1/23/2020	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			ATTORNEY CLIENT PRIVILEGED	ATTORNEY CLIENT PRIVILEGED	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice re: response to public records request; internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.
COS_00009030	COS_00009031	9/22/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Wednesday's Plan	RE: Wednesday's Plan	Yes	Work Product	Internal email reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00012060	COS_00012066	5/5/2021	Formas, Stephanie <stephanie.formas@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Response to SEEC Investigation	RE: Response to SEEC Investigation	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice re: response to public records requests.
COS_00009440		12/14/2020	Ivin, Stacy <stacy.ivin@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			Communication	Communication	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice re: response to public records requests.
COS_V2_00014147	COS_V2_00014147	2/7/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: AC Privilege	RE: AC Privilege	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS_00009436		2/12/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			AC Privilege- for discussion	AC Privilege- for discussion	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009423	COS_00009424	12/7/2020	Ivin, Stacy <stacy.ivin@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Michigan PDR 60767 - For MC Review - Still needs review	RE: Michigan PDR 60767 - For MC Review - Still needs review	Yes	Attorney Client Work Product	Internal email from and to counsel providing and seeking legal advice, and reflecting attorney mental impressions and strategy, in anticipation of litigation re: response to public records requests.
COS_00009072		9/29/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Timeline of Mayor Phone Replacement and Text Messages AC PRIVILEGED	RE: Timeline of Mayor Phone Replacement and Text Messages AC PRIVILEGED	Yes	Attorney Client Work Product	Draft memorandum to City Attorney's Office prepared by and at the direction of counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009073		9/29/2020							Timeline of Mayor Phone Replacement and Text Messages - revised.docx	Timeline of Mayor Phone Replacement and Text Messages - revised.docx	Yes	Attorney Client Work Product	Internal email to counsel seeking and reflecting legal advice re: response to public records request.
COS_00009602	COS_00009604	1/28/2021	Ivin, Stacy <stacy.ivin@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: DelCruz PDR 63727 - For Your Review - AC Communication	RE: DelCruz PDR 63727 - For Your Review - AC Communication	Yes	Attorney Client Work Product	Internal email to counsel providing legal advice re: response to public records requests.
COS_00009532	COS_00009534	1/23/2020	Chen, Michelle <michelle.chen@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			FW: Ivin, Stacy is hitting you to collaborate on mail 5 - 4/01	FW: Ivin, Stacy is hitting you to collaborate on mail 5 - 4/01	Yes	Attorney Client Work Product	Internal email to and from counsel seeking legal advice re: response to public records requests.
COS_00009045		9/23/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			Mayor's phone follow-up	Mayor's phone follow-up	Yes	Attorney Client Work Product	Internal email to and from counsel seeking legal advice re: response to public records requests.
COS_V2_00014136	COS_V2_00014136	2/6/2020	Chen, Michelle <michelle.chen@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: Performance Review Rebuttal - AC PRIVILEGED	RE: Performance Review Rebuttal - AC PRIVILEGED	Yes	Attorney Client Work Product	Internal email to and from counsel seeking legal advice re: response to public records requests.
COS_00009591		11/8/2019	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: AC Privilege- Letter + Talking Points	RE: AC Privilege- Letter + Talking Points	Yes	Attorney Client Work Product	Internal email to and from counsel seeking legal advice re: HR matters.
COS_00009597	COS_00009599	11/18/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			RE: ""AC Text Search Results	RE: ""AC Text Search Results	Yes	Attorney Client Work Product	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.

City of Seattle  
 In/Out, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00009046	COS_00009047	9/23/2020	<kimberly.ferreiro@seattle.gov>	<kimberly.ferreiro@seattle.gov>		<ryan.ajones@seattle.gov>   <chris.fernandez@seattle.gov>   <ndrele.chen@seattle.gov>   <O'Reilly, Bernier, Colleen>   <colleen.oreilly@seattle.gov>	<Ahu, Emmanuel>   <emmanuel.ahu@seattle.gov>		RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email reflecting attorney impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009065		9/28/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED - response to Shiao	Yes	Work Product	Internal email drafted in anticipation of litigation and reflecting attorney strategy re: HR matters.
COS_VZ_00014243	COS_VZ_00014242	2/27/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED - response to Shiao	RE: A/C PRIVILEGED - response to Shiao	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_00009182	COS_00009183	10/14/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED - response to Shiao	RE: A/C PRIVILEGED - response to Shiao	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_VZ_00014376	COS_VZ_00014375	3/10/2021	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: PHILA A/C PRIVILEGE - draft	RE: PHILA A/C PRIVILEGE - draft	Yes	Work Product	Internal email from and to counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS_00009157		10/13/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED - response to Shiao	RE: A/C PRIVILEGED - response to Shiao	Yes	Work Product	Internal email to counsel for purposes of seeking legal advice pertaining to public records requests.
COS_00009537		2/24/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email drafted in anticipation of litigation and reflecting attorney strategy re: HR matters.
COS_00009549		2/24/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice in anticipation of litigation, and draft email from attorney reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009360	COS_00009363	11/18/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice in anticipation of litigation re: response to public records requests.
COS_00009452		12/16/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice in anticipation of litigation re: response to public records requests.
COS_00009413	COS_00009415	12/22/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice in anticipation of litigation re: response to public records requests.
COS_00011494	COS_00011495	3/6/2021	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice in anticipation of litigation re: response to public records requests.
COS_00009974		9/10/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_00009598	COS_00009592	2/17/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_VZ_00014326		9/22/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009603	COS_00009607	2/17/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_VZ_00014144		2/27/2020	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_00009563		2/29/2021	<kimberly.ferreiro@seattle.gov>			<Chen, Michelle>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Work Product	Internal email to counsel seeking legal advice re: HR matters.

City of Seattle  
 In/Out, et al v. City of Seattle  
 KOSCC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
COO_00009135		10/6/2020	<chen.michelle@seattle.gov>			<ferrenio.kimberly@seattle.gov> <kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: [redacted]	RE: [redacted]	Yes	Work Product	Internal email to and from counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COO_00005497	COO_00005500	2/17/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: Draft Job Postings - A/C PRIVILEGED	RE: Draft Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COO_00009100	COO_00009101	9/30/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: MO PDR	RE: MO PDR	Yes	Attorney Client	Internal email to counsel seeking legal advice re: response to public records requests.
COO_V2_00014389	COO_V2_0001439	3/9/2021	<jones.camille@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: ACP	RE: ACP	Yes	Attorney Client	Internal email reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COO_V2_00023066	COO_V2_0002307	2/27/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C PRIVILEGED - response to Stacy	RE: A/C PRIVILEGED - response to Stacy	Yes	Attorney Client	Internal email to and from counsel seeking legal advice in anticipation of litigation re: HR matters.
COO_00005907	COO_00005911	2/17/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: Draft Job Postings - A/C PRIVILEGED	RE: Draft Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COO_00011627		5/9/2021	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		att. client privileged	att. client privileged	Yes	Attorney Client	Draft correspondence from counsel reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COO_00011630		5/9/2021		Chen, Michelle					Document docx	Document docx	Yes	Attorney Client	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.
COO_00011631	COO_00011632	12/22/2020							RE: A/C update on forensic 12.2.2020.pdf	RE: A/C update on forensic 12.2.2020.pdf	Yes	Attorney Client	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.
COO_V2_00023062	COO_V2_0002306	2/17/2020	<wilkinson.zahraa@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C Privilege	RE: A/C Privilege	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COO_00009623	COO_00009624	2/12/2021	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C - Summer Review	RE: A/C - Summer Review	Yes	Attorney Client	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.
COO_V2_00014145		2/27/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		FW:	FW:	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COO_00005512	COO_00005516	2/21/2020	<jones.camille@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C Privilege - [redacted]	RE: A/C Privilege - [redacted]	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COO_V2_00014275	COO_V2_0001428	2/28/2020	<jones.camille@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C Privilege - RE: Vacation Time	RE: A/C Privilege - RE: Vacation Time	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COO_00009328		11/12/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C - Mascagna PDR 6/07/ - For MC Review	RE: A/C - Mascagna PDR 6/07/ - For MC Review	Yes	Attorney Client	Internal email to counsel seeking legal advice re: response to public records requests.
COO_00009015		9/16/2020	<chen.michelle@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C - Status Update	RE: A/C - Status Update	Yes	Work Product	Internal email to and from counsel reflecting strategy and attorney mental impressions in anticipation of litigation re: response to public records requests.
COO_00009670		2/9/2021	<kimberly.ferrenio@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: A/C PRIVILEGED - mayor tax messages	RE: A/C PRIVILEGED - mayor tax messages	Yes	Attorney Client	Internal email to and from counsel reflecting strategy and attorney mental impressions in anticipation of litigation re: response to public records requests.
COO_00009551	COO_00009552	2/27/2020	<jones.camille@seattle.gov>			<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>	<kimberly.ferrenio@seattle.gov> <kimberly.ferrenio@seattle.gov>		RE: Mayor's Office Positions - A/C PRIVILEGED	RE: Mayor's Office Positions - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.

City of Seattle  
City Productions 1-10, 12  
Irvine, et al v. City of Seattle  
KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00009136		10/27/2020	Chen, Michelle <michelle.chen@seattle.gov>			Fernero, Kimberly <kfernery@seattle.gov> Irvine, Stacy <stacy.i@seattle.gov>	Traci, Pam <pam.traci@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: ***AC*** Motiv-Rabson PRR Review	RE: ***AC*** Motiv-Rabson PRR Review	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: response to public records requests.
COS_00005517		2/17/2020	michelle.chen@seattle.gov			Jones, Camille <camille.jones@seattle.gov>			Re: Draft Job Postings - AC PRIVILEGED	Re: Draft Job Postings - AC PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_00003016		9/18/2020	Chen, Michelle <michelle.chen@seattle.gov> Fernero, Kimberly <kfernery@seattle.gov>			Yahu, Emmanuel <emmanuel.yahu@seattle.gov> Fernero, Kimberly <kfernery@seattle.gov> Irvine, Stacy <stacy.i@seattle.gov>	<ngl.janacard@seattle.gov> >   Fernero, Kimberly >   Irvine, Stacy >   stacy.i@seattle.gov>		Re: Mayor's Phone/Text Messages ...	Re: Mayor's Phone/Text Messages ...		Work Product	Internal email to and from counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00003665		11/5/2020	Fernero, Kimberly <kfernery@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			***AC Hinkle Text Search Results	***AC Hinkle Text Search Results	Yes	Attorney Client	Internal email to counsel seeking legal advice in anticipation of litigation re: response to public records requests.
COS_00005496		2/17/2020	Chen, Michelle <michelle.chen@seattle.gov>			Jones, Camille <camille.jones@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege - [redacted]	RE: AC Privilege - [redacted]	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00005491		2/17/2020			Chen, Michelle				Final Talking points from Fernero Meeting. (002).atorney client privileged. Moten.docx	Final Talking points from Fernero Meeting. (002).atorney client privileged. Moten.docx		Attorney Client	Internal email to counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS_00005697		3/5/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov> Fong, Michael <michael.fong@seattle.gov> Fernero, Kimberly <kfernery@seattle.gov> Irvine, Stacy <stacy.i@seattle.gov>	Yaneza, Ernesto <eresto.yaneza@seattle.gov> Fernero, Kimberly <kfernery@seattle.gov> Irvine, Stacy <stacy.i@seattle.gov>		RE: AC PRIVILEGED	RE: AC PRIVILEGED	Yes	Work Product	Internal email to counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS_00005550		2/24/2020	Chen, Michelle <michelle.chen@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			PRR Reorg- AC PRIVILEGED	PRR Reorg- AC PRIVILEGED		Work Product	Internal email from counsel attaching documents identified in anticipation of litigation pertaining to HR matters.
COS_00005554		2/24/2020			Jones, Camille							Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_V2_00014168		2/27/2020	Chen, Michelle <michelle.chen@seattle.gov>			Jones, Camille <camille.jones@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Fong, Michael <michael.fong@seattle.gov>		AC PRIVILEGED	AC PRIVILEGED	Yes	Attorney Client	Internal email to and from counsel providing and seeking legal advice re: response to public records requests.
COS_00003931		1/23/2020	Irvine, Stacy <stacy.i@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Irvine, Stacy is inviting you to collaborate on Instail 5_44011 - AC Privilege Communication	RE: Irvine, Stacy is inviting you to collaborate on Instail 5_44011 - AC Privilege Communication	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00003943		12/17/2020	Irvine, Stacy <stacy.i@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Beakman PRR 60951 - For Your Review - AC Communication	RE: Beakman PRR 60951 - For Your Review - AC Communication	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014298		3/11/2020	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov> Fernero, Kimberly <kfernery@seattle.gov>	Yanbruster, Ginger <ginger.yanbruster@seattle.gov> Irvine, Stacy <stacy.i@seattle.gov>		RE: AC Privilege - FW: Job posting info	RE: AC Privilege - FW: Job posting info	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00003966		9/28/2020	Chen, Michelle <michelle.chen@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: [redacted]	RE: [redacted]	Yes	Work Product	Internal email from counsel to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00003555		1/23/2020	Chen, Michelle <michelle.chen@seattle.gov>			Jones, Camille <camille.jones@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			AC PRIVILEGED	AC PRIVILEGED		Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00003964		11/18/2020	Chen, Michelle <michelle.chen@seattle.gov>			Fernero, Kimberly <kfernery@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Jones, Camille <camille.jones@seattle.gov>			RE: ***AC Text Search Results	RE: ***AC Text Search Results	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice, and reflecting attorney mental impressions and strategy, in anticipation of litigation re: response to public records requests.
COS_V2_00014282		2/28/2020	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>						RE: AC Privilege - RE: Vacation Time	RE: AC Privilege - RE: Vacation Time	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.



City of Seattle  
 City Productions 1-10, 12  
 In/In, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
COS_00009075		9/29/2020	In/In, Stacy <stacy.in@seattle.gov>	Aloncastro, Regi	Chen, Michelle	Chen, Michelle <michelle.chen@seattle.gov>	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>		RE: Pace PDR No. 59220 - For your Review - A/C Communication	Timeline of Major Person's Replacement and Texts Messages.docx	Yes	Attorney Client / Work Product	Memorandum edited by and provided by counsel reflecting attorney mental impressions and legal advice re: response to public records requests.
COS_00009025		9/20/2020	In/In, Stacy <stacy.in@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: Pace PDR No. 59220 - For your Review - A/C Communication	RE: Pace PDR No. 59220 - For your Review - A/C Communication	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice re: response to public records requests.
COS_VZ_00014800		3/11/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		AC Privilege - FYI: Job posting info	AC Privilege - FYI: Job posting info	Yes	Attorney Client / Work Product	Internal email chain with counsel for purposes of seeking legal advice in anticipation of litigation re: response to public records requests.
COS_VZ_00014149		2/9/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: Performance Review Rebuttal A/C PRIVILEGED	RE: Performance Review Rebuttal A/C PRIVILEGED	Yes	Attorney Client / Work Product	Internal email to counsel for purposes of seeking legal advice and attaching a document to seek participation in litigation re: response to public records requests.
COS_00009368		11/17/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>		RE: ***A/C Hitako Text Search Results	RE: ***A/C Hitako Text Search Results	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice re: response to public records requests.
COS_00009092		11/8/2019	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>		RE: A/C Privilege- Letter + Talking Points	RE: A/C Privilege- Letter + Talking Points	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00009093		11/8/2019	Jones, Camille <camille.jones@seattle.gov>	Thompson, Mayumi	Jones, Camille	Chen, Michelle <michelle.chen@seattle.gov>	Olsen, Paul <paul.olsen@seattle.gov>		RE: A/C Privilege- Letter + Talking Points	In/In Letter(s).docx	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00009094		11/8/2019	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: A/C Privilege- for discussion	Talking points In/In Meeting(s).docx	Yes	Attorney Client / Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice re: HR matters.
COS_00009437		2/12/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Aloncastro, Regi <regi.aloncastro@seattle.gov>		RE: A/C Privilege- for discussion	RE: A/C Privilege- for discussion	Yes	Attorney Client / Work Product	Internal email to counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.
COS_00009019		9/18/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>		***A/C*** Status Update	***A/C*** Status Update	Yes	Attorney Client / Work Product	Internal email to counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.
COS_00011637		5/4/2021			Chen, Michelle	Chen, Michelle <michelle.chen@seattle.gov>			Response to Mr. Remmen 5.4.2021.pdf	Additional information - Email Records.pdf	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and reflecting legal advice and attorney mental impressions re: response to public records requests.
COS_VZ_00014254		2/28/2020	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: A/C Privilege - RE: Vacation Time	RE: A/C Privilege - RE: Vacation Time	Yes	Attorney Client / Work Product	Internal email chain to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00009067		9/28/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Ferraro, Kimberly <kimberly.ferraro@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>		RE: ***A/C***	RE: ***A/C***	Yes	Attorney Client / Work Product	Internal email to counsel reflecting attorney planning and strategy in anticipation of litigation re: response to public records requests.
COS_00009061		2/9/2021	Brown, Angie <angie.brown@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>		RE: Delacruz PDR 63277 - For Your Review - Attorney Client Privileged	RE: Delacruz PDR 63277 - For Your Review - Attorney Client Privileged	Yes	Attorney Client / Work Product	Internal email chain to and from counsel seeking and providing legal advice in anticipation of litigation re: response to public records requests.
COS_00009004		9/17/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Aloncastro, Regi <regi.aloncastro@seattle.gov>		FW: From Emmanuel	FW: From Emmanuel	Yes	Attorney Client / Work Product	Internal email reflecting planning and strategy in anticipation of litigation re: response to public records requests.
COS_00009005		9/16/2020	Arn, Emmanuel <emmanuel.arn@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: Mayor's Personal Text Messages ...	RE: Mayor's Personal Text Messages ...	Yes	Attorney Client / Work Product	Internal email chain to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_VZ_00014261		2/28/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: A/C PRIVILEGED - response to Stacy	RE: A/C PRIVILEGED - response to Stacy	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice re: response to public records requests.
COS_00009071		2/9/2021	Chen, Michelle <michelle.chen@seattle.gov>			Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: Schwartz # 64122 Lvl Review	RE: Schwartz # 64122 Lvl Review	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice re: response to public records requests.

Privilege Log  
 City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
COS_00005933		2/24/2020	Michelle Chen@seattle.gov			James Camille <camille.jones@seattle.gov>	Wilkinson Zahraa <zahraa.wilkinson@seattle.gov>		RE: A/C PRIVILEGED	Re: A/C PRIVILEGED	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00006442		1/28/2020	Ivin, Stacy <stacy.ivin@seattle.gov>			Michelle Chen@seattle.gov   Fredrick, Andrea <andrea.fredrick@seattle.gov>			RE: Ivin, Stacy is inviting you to collaborate on Instill 5, 44011 - A/C Privilege Communication	RE: Ivin, Stacy is inviting you to collaborate on Instill 5, 44011 - A/C Privilege Communication	Yes	Attorney Client	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.
COS_00012073		5/5/2021	Chen, Michelle <michelle.chen@seattle.gov>			Ramsey Ramerman <ramseyramerman@gmail.com>			RE: Response to SEEC Investigation	RE: Response to SEEC Investigation	Yes	Attorney Client / Work Product	Email from counsel reflecting legal advice and strategy in anticipation of litigation re: response to public records requests.
COS_00009120		9/18/2020	Chen, Michelle <michelle.chen@seattle.gov>			Yahu, Emmanuel <emmanuel.yahu@seattle.gov>			RE: Mayor's Phone/Text Messages...	RE: Mayor's Phone/Text Messages...		Work Product	Internal email to and from counsel reflecting attorney, mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00005774		1/20/2020	James Camille <camille.jones@seattle.gov>			Ivin, Stacy <stacy.ivin@seattle.gov>			A/C Privilege - next steps Ivin, please review	A/C Privilege - next steps Ivin, please review	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00009654		2/9/2021	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>   Formas, Stephanie <stephanie.formas@seattle.gov>   Kline, Julie <julie.kline@seattle.gov>			RE: Brooks PDR 64654 -- For your review	RE: Brooks PDR 64654 -- For your review	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and strategy in anticipation of litigation re: response to public records requests.
COS_00009105		9/30/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: MO PDR	RE: MO PDR	Yes	Attorney Client	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00009374		1/23/2020	James Camille <camille.jones@seattle.gov>			Ivin, Stacy <stacy.ivin@seattle.gov>			A/C Privilege - next steps Ivin, please review	A/C Privilege - next steps Ivin, please review	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00009654		2/9/2021	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: Ivin, Stacy is inviting you to collaborate on Instill 5, 44011	RE: Ivin, Stacy is inviting you to collaborate on Instill 5, 44011	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and strategy in anticipation of litigation re: response to public records requests.
COS_00009198		1/27/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: ***A/C*** Beekman - Policy Memo	RE: ***A/C*** Beekman - Policy Memo	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009304		9/22/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			Wednesday's Plan	Wednesday's Plan	Yes	Work Product	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009184		10/14/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: *** A/C Review Question	RE: *** A/C Review Question	Yes	Attorney Client	Email reflecting legal advice and reflecting attorney, mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00012082		5/5/2021	Chen, Michelle <michelle.chen@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>			FW: Response to SEEC Investigation	FW: Response to SEEC Investigation	Yes	Attorney Client / Work Product	Internal email from and to counsel providing and seeking legal advice re: HR matters.
COS_00005934		2/4/2020	James Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel providing and seeking legal advice re: response to public records requests.
COS_00009143		10/9/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: ***A/C*** Moritz 59632 MC Review	RE: ***A/C*** Moritz 59632 MC Review	Yes	Attorney Client	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.
COS_V2_00014372		3/10/2021	James Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: FMLA A/C PRIVILEGE - draft	RE: FMLA A/C PRIVILEGE - draft	Yes	Work Product	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.
COS_00005955		11/8/2019	Michelle Chen@seattle.gov			James Camille <camille.jones@seattle.gov>			RE: A/C Privilege- Letter + Talking Points	RE: A/C Privilege- Letter + Talking Points	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_V2_00014161		2/26/2020	Chen, Michelle <michelle.chen@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			FW: Vacation Time	FW: Vacation Time	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS_00009137		10/7/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			RE: ***A/C*** Public Record Review Request	RE: ***A/C*** Public Record Review Request	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00009145		10/9/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			***A/C*** Moritz 59632 MC Review	***A/C*** Moritz 59632 MC Review	Yes	Attorney Client	Internal email to counsel reflecting legal advice and strategy in anticipation of litigation re: response to public records requests.
COS_00009370		11/5/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			***A/C Text Search Results	***A/C Text Search Results	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS_00005622		2/17/2020	Chen, Michelle <michelle.chen@seattle.gov>			James Camille <camille.jones@seattle.gov>			RE: Dietl Job Postings - A/C PRIVILEGED	RE: Dietl Job Postings - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel reflecting and seeking legal advice re: response to public records requests.
COS_00009147		10/9/2020	Ferraro, Kimberly <kimberly.ferraro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: ***A/C*** Moritz 59632 MC Review	RE: ***A/C*** Moritz 59632 MC Review	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.

City of Seattle  
 City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00009395		2/4/2020	Juan, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov> Anzosa, Estimar <arnesto_arezca@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Fernandes, Stephanie <stephanie.fernandes@seattle.gov> Hernandez, Ismael <ismael.hernandez@seattle.gov> Hockaday, Bryan <bryan.hockaday@seattle.gov> Ranganathan, Shella <shella.ranganathan@seattle.gov> Stephens, Dominique <dominique.stephens@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: A/C PRIVILEGED	Re: A/C PRIVILEGED	Yes	Attorney Client / Work Product	Internal email thread to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS_00009606		6/9/2020	Ivin, Stacy <stacyjivm@seattle.gov>						RE: PDR No. 59020 - New Barnett Request - A/C Communication	RE: PDR No. 59020 - New Barnett Request - A/C Communication	Yes	Attorney Client	Internal email to counsel seeking legal advice re: response to public records requests.
COS_00009623		9/22/2021		Marikose	Ferreiro, Kimberly				New Employee Orientation - Public Records Act PPT	New Employee Orientation - Public Records Act PPT		Attorney Client	PowerPoint prepared by counsel providing legal advice re: responding to public records requests.
COS_00009624		9/22/2021		Fanklin, Erica R	Ferreiro, Kimberly				PDR 101 (EE - 1-22-19) Print Version.pdf	PDR 101 (EE - 1-22-19) Print Version.pdf		Attorney Client	Internal email from and to counsel providing legal advice re: responding to public records requests.
COS_00009648		1/23/2020	michelle.chen@seattle.gov			Ivin, Stacy <stacyjivm@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>	Friedhof, Andrea <andrea.friedhof@seattle.gov>		Re: Ivin, Stacy is inviting you to collaborate on Instill 5.44011 - A/C Privilege Communication	Re: Ivin, Stacy is inviting you to collaborate on Instill 5.44011 - A/C Privilege Communication	Yes	Attorney Client	Internal email to and from counsel seeking and seeking legal advice re: response to public records requests.
COS_VZ_00014289		2/28/2020	Jones, Camille <camille.jones@seattle.gov>			Ivin, Stacy <stacyjivm@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>	Friedhof, Andrea <andrea.friedhof@seattle.gov>		RE: A/C Privilege - RE: Vacation Time Re: Ivin, Stacy is inviting you to collaborate on Instill 5.44011 - A/C Privilege Communication	RE: A/C Privilege - RE: Vacation Time Re: Ivin, Stacy is inviting you to collaborate on Instill 5.44011 - A/C Privilege Communication	Yes	Attorney Client / Work Product	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.
COS_00012948		2/23/2021				Ivin, Stacy <stacyjivm@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			Re: Beekman PDR 60951 - For Your Review - A/C Communication	Re: Beekman PDR 60951 - For Your Review - A/C Communication	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009457		12/17/2020	michelle.chen@seattle.gov			Ivin, Stacy <stacyjivm@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			Re: Beekman PDR 60951 - For Your Review - A/C Communication	Re: Beekman PDR 60951 - For Your Review - A/C Communication	Yes	Attorney Client	Internal email from and to counsel providing legal advice and providing legal advice re: response to public records requests.
COS_00009459		12/17/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ivin, Stacy <stacyjivm@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			Re: Beekman PDR 60951 - For Your Review - A/C Communication	Re: Beekman PDR 60951 - For Your Review - A/C Communication	Yes	Attorney Client	Internal email from and to counsel providing legal advice and providing legal advice re: response to public records requests.
COS_00009522		1/14/2021	Chen, Michelle <michelle.chen@seattle.gov>			Ivin, Stacy <stacyjivm@seattle.gov> Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			Re: Moritz PDR 59632 - ACP Communication	Re: Moritz PDR 59632 - ACP Communication	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.
COS_VZ_00014138		2/6/2020				Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: Performance Review Rebuttal - A/C PRIVILEGED	RE: Performance Review Rebuttal - A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel for purposes of seeking legal advice regarding to HR matters.
COS_00009573		11/17/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Jones, Camille <camille.jones@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			RE: ***A/C Hitko Text Search Results RE: FMLA A/C PRIVILEGE - draft response	RE: ***A/C Hitko Text Search Results RE: FMLA A/C PRIVILEGE - draft response	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: response to public records requests.
COS_VZ_00014374		3/10/2021	michelle.chen@seattle.gov			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Jones, Camille <camille.jones@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			RE: ***A/C Hitko Text Search Results RE: FMLA A/C PRIVILEGE - draft response	RE: ***A/C Hitko Text Search Results RE: FMLA A/C PRIVILEGE - draft response	Yes	Attorney Client / Work Product	Internal email reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00009877		9/11/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Jones, Camille <camille.jones@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			RE: Mayor's Prioror/Text Messages ... collaborate on Instill 5.44011 - A/C Privilege Communication	RE: Mayor's Prioror/Text Messages ... collaborate on Instill 5.44011 - A/C Privilege Communication	Yes	Attorney Client	Internal email thread to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS_00009427		1/23/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Jones, Camille <camille.jones@seattle.gov> Thompson, Adrienne <adrienne.thompson@seattle.gov>			RE: Vacation Time ATTORNEY CLIENT PRIVILEGED	RE: Vacation Time ATTORNEY CLIENT PRIVILEGED	Yes	Attorney Client / Work Product	Internal email from and to counsel seeking legal advice and providing legal advice re: HR matters.
COS_VZ_00014164		2/28/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Jones, Camille <camille.jones@seattle.gov>			RE: Vacation Time ATTORNEY CLIENT PRIVILEGED	RE: Vacation Time ATTORNEY CLIENT PRIVILEGED	Yes	Attorney Client / Work Product	Internal email from and to counsel seeking legal advice and providing legal advice re: HR matters.



Privilege Log  
 City Productions 1-10, 12  
 Irwin, et al v. City of Seattle  
 KOSC No. 21-2-1739-9 SEA

BagDates	EndDates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>	Yancastro, Reg <reg.yancastro@seattle.gov> Friedrich, Michael <michael.friedrich@seattle.gov> Irwin, Stacy <stacy.irwin@seattle.gov>		RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	Yes	Work Product	Internal email to and from counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests
COS 00009415	COS 00009419	1/29/2020	Irwin, Stacy <stacy.irwin@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	Yes	Attorney-Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests
COS 00009420		5/29/2019							Page 75.pdf		Yes	Attorney-Client	Internal email to and from counsel providing legal advice re: contract dispute
COS 00009117	COS 00009118	10/5/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Chen, Frances <frances.chen@seattle.gov> Hoffield, Amanda <amanda.hoffield@seattle.gov> Ranganathan, Sheela <sheela.ranganathan@seattle.gov> >   Stephens, Dominick <dominick.stephens@seattle.gov>			Re: ***AC*** Text Question	Re: ***AC*** Text Question	Yes	Attorney-Client / Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests
COS 00009829	COS 00009830	7/29/2020	Chen, Michelle <michelle.chen@seattle.gov>			Irwin, Stacy <stacy.irwin@seattle.gov>			PR request AC PRIVILEGED	PR request AC PRIVILEGED	Yes	Attorney-Client	Internal email from counsel providing legal advice re: response to public records requests
COS 00009402	COS 00009404	1/29/2020	Chen, Michelle <michelle.chen@seattle.gov>			Irwin, Stacy <stacy.irwin@seattle.gov>			RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	Yes	Attorney-Client	Internal email from counsel providing legal advice re: response to public records requests
COS 00009405	COS 00009409	1/29/2020	Chen, Michelle <michelle.chen@seattle.gov>			Irwin, Stacy <stacy.irwin@seattle.gov>			RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	Yes	Attorney-Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests
COS VZ 00014140	COS VZ 0001414	2/6/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE Performance Review Rebuttal - AC PRIVILEGED	RE Performance Review Rebuttal - AC PRIVILEGED	Yes	Attorney-Client	Internal email to and from counsel for purposes of seeking and providing legal advice re: HR matters.
COS VZ 00014905	COS VZ 0001493	3/19/2020	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege -FW- Job posting info	RE: AC Privilege -FW- Job posting info	Yes	Attorney-Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00009375	COS 00009376	11/5/2020	Chen, Michelle <michelle.chen@seattle.gov>			Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov>			RE: ***AC*** Hinko Text Search Results	RE: ***AC*** Hinko Text Search Results	Yes	Attorney-Client / Work Product	Internal email from counsel seeking legal advice re: records requests re: response to public records requests
COS 00012150	COS 00012153	5/4/2021				Chen, Michelle <michelle.chen@seattle.gov>			Response to Ramsey Remerman.pdf	Response to Ramsey Remerman.pdf	Yes	Attorney-Client / Work Product	Draft correspondence provided to counsel for purpose of seeking review and legal advice in anticipation of litigation re: HR matters
COS 00012155	COS 00012160	5/10/2021				Angela Trinh					Yes	Attorney-Client	Letter from counsel reflecting legal advice re: response to public records requests
COS 00012161	COS 00012160	2/9/2021				Chen, Michelle <michelle.chen@seattle.gov>			Additional Info - Emails.pdf	Additional Info - Emails.pdf	Yes	Attorney-Client / Work Product	Internal email from counsel providing and reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests
COS 00009366		11/7/2019	Jones, Camille <camille.jones@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov> Chen, Frances <frances.chen@seattle.gov> >   Olsen, Paul <paul.olsen@seattle.gov>			RE: AC Privilege - Letter + Talking Points - drafts	RE: AC Privilege - Letter + Talking Points - drafts	Yes	Attorney-Client	Internal email to counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters
COS 00009367		11/7/2019	Jones, Camille <camille.jones@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: AC Privilege -FW- Job posting info	RE: AC Privilege -FW- Job posting info	Yes	Attorney-Client / Work Product	Draft memorandum provided to counsel for purpose of seeking review and legal advice in anticipation of litigation re: HR matters
COS 00009368		11/7/2019	Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov>			Thompson, Mayumi <mayumi.thompson@seattle.gov>			RE: December Vacation Request	RE: December Vacation Request	Yes	Attorney-Client / Work Product	Internal email reflecting legal advice and mental impressions pertaining to public records requests
COS VZ 00014328	COS VZ 0001433	11/18/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: AC Privilege -FW- Job posting info	RE: AC Privilege -FW- Job posting info	Yes	Attorney-Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters
COS VZ 00014301	COS VZ 0001430	3/11/2020	Chen, Michelle <michelle.chen@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	Yes	Attorney-Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests
COS 00009474	COS 00009480	1/29/2020	Irwin, Stacy <stacy.irwin@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov> Ferreiro, Kimberly <kimberly.ferreiro@seattle.gov> Irwin, Stacy <stacy.irwin@seattle.gov>			RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	RE: Irwin, Stacy is inviting you to collaborate on Install 5, 44011 - AC Privilege Communication	Yes	Attorney-Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests
COS 00009139	COS 00009140	10/7/2020							RE: ***AC*** Public Record Review Request	RE: ***AC*** Public Record Review Request	Yes	Attorney-Client	Internal email to counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests

City Productions 1-10, 12  
*Ivins, et al v. City of Seattle*  
 KOSC No. 21-2-11739-9 SEA

Case No.	End Bates	Document Date	From	To	Property - Author	Last Author Saved By	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS 00005396		2/24/2020	Jones, Camille <jcamille.jones@seattle.gov>	Wilkinson, Zahara <zahara.wilkinson@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>		RE: A/C PRIVILEGED	Re: A/C PRIVILEGED	Yes	Attorney Client	Internal email to and from counsel for purposes of seeking and providing legal advice re: HR matters.
COS 00005672		2/29/2021	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: Schwartz # 64122 Lvl1 Review	RE: Schwartz # 64122 Lvl1 Review	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00009130		10/6/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Vala, Anant <anant.vala@seattle.gov>		text messages A/C PRIVILEGED	text messages A/C PRIVILEGED	Yes	Attorney Client	Internal email from counsel regarding and providing legal advice re: response to public records requests.
COS 00008140		1/27/2020	Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: **A/C** Beckman - Policy Memo	RE: **A/C** Beckman - Policy Memo	Yes	Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00008492		[2/11/2020]			Law User	lawuser				Deliberative Process Duty to Redact.docx		Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00009119		10/5/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: **A/C** Text Question	Re: **A/C** Text Question	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00008410		1/23/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Fong, Michael <michael.fong@seattle.gov>		RE: Ivins, Stacy is inviting you to collaborate on Instill 5, 44011	RE: Ivins, Stacy is inviting you to collaborate on Instill 5, 44011	Yes	Attorney Client	Draft internal email from counsel providing legal advice re: response to public records requests.
COS 00009141		1/27/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: Brooks #64365	RE: Brooks #64365	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00009725		3/4/2021	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Wilkinson, Zahara <zahara.wilkinson@seattle.gov>		RE: **A/C** Schurer Review	RE: **A/C** Schurer Review	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00005925		2/12/2021	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: **A/C** Public Record Review Request	RE: **A/C** Public Record Review Request	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00005461		12/16/2020	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: **A/C** Public Record Review Request	RE: **A/C** Public Record Review Request	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00009141		1/27/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: Brooks #64365	RE: Brooks #64365	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00009727		3/4/2021	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: **A/C** Schurer Review	RE: **A/C** Schurer Review	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00005925		2/12/2021	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: **A/C** Public Record Review Request	RE: **A/C** Public Record Review Request	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00005397		2/4/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: A/C PRIVILEGED	RE: A/C PRIVILEGED	Yes	Attorney Client	Internal email to counsel seeking legal advice in anticipation of litigation pertaining to HR matters.
COS 00006979		1/19/2020	Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: **A/C** Hinko Text Search Results	RE: **A/C** Hinko Text Search Results	Yes	Attorney Client	Internal email to counsel seeking legal advice re: anticipation of litigation.
COS 00005438		2/12/2020	Jones, Camille <jcamille.jones@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: A/C PRIVILEGED - for discussion	RE: A/C PRIVILEGED - for discussion		Attorney Client	Internal email thread to counsel for purposes of seeking legal advice re: HR matters.
COS 00005376		1/30/2020	Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: A/C PRIVILEGED - next steps Ivins, please review	RE: A/C PRIVILEGED - next steps Ivins, please review		Attorney Client	Internal email to counsel seeking legal advice, and draft email correspondence to counsel seeking legal advice, re: HR matters.
COS 00005439		2/12/2020	Chen, Michelle <michelle.chen@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: A/C PRIVILEGED - for discussion	RE: A/C PRIVILEGED - for discussion		Attorney Client	Internal email thread to counsel seeking legal advice re: HR matters.
COS V2_00014303		3/12/2020	Jones, Camille <jcamille.jones@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: A/C PRIVILEGED - for discussion	RE: A/C PRIVILEGED - for discussion	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00008433		1/27/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>			Chen, Anant <anant.chen@seattle.gov>		RE: **A/C** Beckman - Policy Memo	RE: **A/C** Beckman - Policy Memo	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00005455		2/13/2020	Jones, Camille <jcamille.jones@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>			Forman, Stephanie <stephanie.forman@seattle.gov>		RE: A/C Privilege - Timeline & Taking Points to HR Restructure - updated	RE: A/C Privilege - Timeline & Taking Points to HR Restructure - updated		Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00005456		[2/13/2020]			Jones, Camille	jones, camille			RE: **A/C** Beckman - Policy Memo	RE: **A/C** Beckman - Policy Memo	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00009151		9/23/2020	Ivins, Stacy <stacy.ivins@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					FW: Mayor Phone carrier	FW: Mayor Phone carrier	Yes	Work Product	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.
COS 00005463		12/17/2020	Ivins, Stacy <stacy.ivins@seattle.gov>	Chen, Michelle <michelle.chen@seattle.gov>					RE: Beckman PDR 60951 - For Your Review - A/C Communication	RE: Beckman PDR 60951 - For Your Review - A/C Communication	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.
COS 00005427		11/10/2020	michelle.chen@seattle.gov	Ivins, Stacy <stacy.ivins@seattle.gov>					Re: Misdiagnia PDR 60767 -- For MC Review - Still needs review	Re: Misdiagnia PDR 60767 -- For MC Review - Still needs review	Yes	Attorney Client	Internal email to counsel for purposes of seeking legal advice re: response to public records requests.
COS 00009120		10/5/2020	Chen, Michelle <michelle.chen@seattle.gov>	Ferrero, Kimberly <kimberly.ferrero@seattle.gov>					RE: **A/C** Text Question	RE: **A/C** Text Question	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: response to public records requests.

City of Seattle  
 City Productions 1-10, 12  
 In/In, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagDates	EndDates	Document Date	From	To	Mail/Office Property - Author	Mail/Office Property - Last Author Saved By	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_000015381	COS_000093382	11/5/2020	Chen, Michalee <cmichalee@seattle.gov>	Ferren, Kimberly <kferren@seattle.gov>					RE: ""AC Hitko Text Search Results	RE: ""AC Hitko Text Search Results	Yes	Attorney Client Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: response to public records requests.
COS_000015453	COS_000084458	1/23/2020	In/In, Stacy <stacy.in@seattle.gov>	Chen, Michalee <cmichalee@seattle.gov>		Ferren, Andrea <andrea.ferren@seattle.gov>		RE: In/In, Stacy is inviting you to collaborate on InMail 5_44011 - AC Privilege Communication	RE: In/In, Stacy is inviting you to collaborate on InMail 5_44011 - AC Privilege Communication	Yes	Attorney Client	Internal email from and to counsel providing and seeking legal advice re: response to public records requests.	
COS_000015440		2/12/2020	Chen, Michalee <cmichalee@seattle.gov>	Chen, Michalee <cmichalee@seattle.gov>				RE: AC Privilege - for discussion	RE: AC Privilege - for discussion			Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_000015434	COS_00008835	7/28/2020	In/In, Stacy <stacy.in@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>				RE: PDR request AC PRIVILEGED	RE: PDR request AC PRIVILEGED	Yes	Attorney Client	Internal email from counsel providing legal advice re: response to public records requests.	
COS_V2_00014379	COS_V2_0001438	3/10/2021	Jones, Camille <ccamille.jones@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>				AC Privilege MO Issue	AC Privilege MO Issue	Yes	Attorney Client	Internal email to counsel seeking legal advice re: HR matters.	
COS_V2_00014476	COS_V2_0001447	6/23/2021	In/In (Moraes)	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		Attorney Client Privileged Information.	Attorney Client Privileged Information.	Yes	Attorney Client Work Product	Internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014493	COS_V2_0001444	6/28/2021	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>	Moraes, ANDR <andmoraes@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014495	COS_V2_0001445	6/28/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014479	COS_V2_0001445	6/23/2021	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>	Moraes, ANDR <andmoraes@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		FW: Update (Attorney Client Privilege Information)	FW: Update (Attorney Client Privilege Information)	Yes	Attorney Client Work Product	Internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014498	COS_V2_0001444	5/28/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		FW: Update (Attorney Client Privilege Information)	FW: Update (Attorney Client Privilege Information)	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014498		6/28/2021	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>	Moraes, ANDR <andmoraes@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014395	COS_V2_0001438	4/5/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Tsang, Danielle M <danielle.tsang@seattle.gov>		RE: AC Privilege - FW: FML Approval	RE: AC Privilege - FW: FML Approval	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014499	COS_V2_0001445	6/23/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014501	COS_V2_0001445	6/23/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	Yes	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.	
COS_00004921		6/29/2021		Wilkinson, Zahra <zahra.wilkinson@seattle.gov>				Attorney/Client Privileged Information (In/In, S)	Attorney/Client Privileged Information (In/In, S)			Attorney Client Work Product	Internal email to counsel for purposes of seeking legal advice and attaching documents to seek pending legal advice in anticipation of litigation re: HR matters.
COS_V2_00014481	COS_V2_0001444	6/23/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		Attorney Client Privileged Information.	Attorney Client Privileged Information.	Yes	Attorney Client Work Product	Internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.	
COS_V2_00014474		6/23/2021	Jones, Camille <ccamille.jones@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client Work Product	Internal email to counsel for purposes of seeking legal advice and attaching documents to seek pending legal advice in anticipation of litigation re: HR matters.	
COS_00004151		5/14/2021	Moraes, ANDR <andmoraes@seattle.gov>	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		Attorney/Client Privileged Information (In/In, S)	Attorney/Client Privileged Information (In/In, S)			Attorney Client Work Product	Internal email to and from counsel for seeking and providing legal advice, and draft email to counsel providing legal advice, in anticipation of litigation re: HR matters.
COS_V2_00014554	COS_V2_0001455	6/28/2021	In/In (Moraes)	Wilkinson, Zahra <zahra.wilkinson@seattle.gov>		Jones, Camille <ccamille.jones@seattle.gov>		RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	RE: re: ORE: Sick time ATTORNEY CLIENT PRIVILEGE	Yes	Attorney Client Work Product	Internal email to and from counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.	

City of Seattle  
 City Productions 1-10, 12  
 In/n/v, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_V2_00014484	COS_V2_0001448	6/23/2021	Jones, Camille <jcamille.jones@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014486	COS_V2_0001448	6/23/2021	Morales, aNdr <randi.morales@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014387	COS_V2_0001438	4/5/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: AC Privilege - FW: FML Approval	RE: AC Privilege - FW: FML Approval	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014462		6/22/2021	Morales, aNdr <randi.morales@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			FW: (Client Attorney/Privileged Information)	FW: (Client Attorney/Privileged Information)	Yes	Attorney Client / Work Product	Internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS_V2_00014475		6/23/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client / Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014468	COS_V2_0001446	6/23/2021	Morales, aNdr <randi.morales@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client / Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014490	COS_V2_0001446	6/23/2021	Morales, aNdr <randi.morales@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Yes	Attorney Client / Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_V2_00014389	COS_V2_0001438	4/5/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <jcamille.jones@seattle.gov>			RE: AC Privilege - FW: FML Approval	RE: AC Privilege - FW: FML Approval	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00007215		4/22/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Zweirn, Steve <stevew.zweirn@seattle.gov>			RE: AC - Advice requested re Michelle Chen matter	RE: AC - Advice requested re Michelle Chen matter		Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00007217		4/22/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Zweirn, Steve <stevew.zweirn@seattle.gov>			RE: AC - Advice requested re Michelle Chen matter	RE: AC - Advice requested re Michelle Chen matter		Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00007522		4/29/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Kuna, Christy <christy.kuna@seattle.gov>			RE: AC - Advice requested re Michelle Chen matter	RE: AC - Advice requested re Michelle Chen matter		Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00007214		4/29/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Kuna, Christy <christy.kuna@seattle.gov>			FW: AC - Advice requested re Michelle Chen matter	FW: AC - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS_00007371		4/29/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			FW: AC - Advice requested re Michelle Chen matter	FW: AC - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS_00007218		4/22/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC - Advice requested re Michelle Chen matter	RE: AC - Advice requested re Michelle Chen matter		Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS_00007500	COS_00007502	5/5/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Sy, Jennifer <jennifer.sy@seattle.gov>			RE: AC - Advice requested re Michelle Chen matter	RE: AC - Advice requested re Michelle Chen matter	Yes	Attorney Client	Internal email relating legal advice obtained re: HR matters.
COS_00007219		4/22/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC - Advice requested re Michelle Chen matter	RE: AC - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS_00007349	COS_00007351	5/5/2021	Zweirn, Steve <stevew.zweirn@seattle.gov>			Sy, Jennifer <jennifer.sy@seattle.gov>			RE: NEEDED INPUT - Case assignment and email code...	RE: NEEDED INPUT - Case assignment and email code...	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.

**Privilege Log**  
City Productions 1-10, 12  
*Ivvin, et al v. City of Seattle*  
KOSC No. 21-2-11739-9 SEA

BugBases	EndBases	Document Date	From	[Media] Office Property - Author	[Media] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Media] File Name	Redactions?	Privilege Type	Privilege Description
COS 00007216		4/22/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> <camille.jones@seattle.gov> I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.s
COS 00007213		4/15/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		ACP - Advice requested re Michelle Chen matter	ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS 00007993		4/22/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007832		5/28/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>			RE: ACP Ferrerio, Ivvin matter(1).pdf		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.s
COS 00007992		4/22/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007991		4/22/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007989		4/22/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Wilkinson, Zahraa> <zahraa.wilkinson@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007835		5/25/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP Ferrerio, Ivvin matter(4).pdf		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007839		5/25/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP Ferrerio, Ivvin matter(5).pdf		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007831		5/28/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP Ferrerio, Ivvin matter(2).pdf		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007840		5/25/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	ACP Ferrerio, Ivvin matter.pdf		Attorney Client	Internal email to counsel seeking legal advice re: HR matters.
COS 00007834		5/25/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP Ferrerio, Ivvin matter(3).pdf		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007990		4/22/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking and providing legal advice re: HR matters.
COS 00007822		5/28/2021	<Zwein, Steve> <stewe.zwein@seattle.gov>			<Zwein, Steve> <stewe.zwein@seattle.gov>	Dajana, Krista <krista@dajana@seattle.gov> I-Jones, Camille I-Sy, Jennifer <jennifer.sy@seattle.gov>		RE: ACP Ferrerio/Ivvin matter	RE: ACP Ferrerio/Ivvin matter		Attorney Client	Internal email from counsel reflecting legal advice and rendering attorney mental impressions and confidences of litigation re: response to public records requests.
COS 00012027		5/5/2021	<Chen, Michelle> <michelle.chen@seattle.gov>			<Chen, Michelle> <michelle.chen@seattle.gov>	Fong, Michael <michael.fong@seattle.gov> I-Sy, Jennifer <jennifer.sy@seattle.gov>		att. client privileged	att. client privileged	Yes	Attorney Client	Draft correspondence reflecting legal advice and rendering attorney mental impressions and confidences of litigation re: response to public records requests.
COS 00012028		[5/5/2021]		Chen, Michelle			Kuna, Christy <christy.kuna@seattle.gov>			Document.docx	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice re: HR matters.

City of Seattle  
City Productions 1-10, 12  
Irwin, et al v. City of Seattle  
KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	[Media] Office Property - Author	[Media] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Media] File Name	Redactions?	Privilege Type	Privilege Description
	COS_00012031	1/22/2020				<frong.michael@seattle.gov>   <michael.fong@seattle.gov>   <stephanie.fornas@seattle.gov>   <zabrina.wilkinson@seattle.gov>	<frong.michael@seattle.gov>		RE: AC Privilege - Stacy Irwin Resignation Letter	RE: AC Privilege - Stacy Irwin Resignation Letter	Yes	Attorney Client / Work Product	Internal email from counsel providing and reflecting legal advice and strategy in anticipation of litigation re: response to public records requests.
	COS_V2_00014463	6/22/2021	<Jones, Camille>			<frong.michael@seattle.gov>   <stephanie.fornas@seattle.gov>   <zabrina.wilkinson@seattle.gov>			RE: AC Privilege - Stacy Irwin Resignation Letter	RE: AC Privilege - Stacy Irwin Resignation Letter	Yes	Attorney Client / Work Product	Internal email to counsel (for purposes of seeking legal advice) in anticipation of litigation re: HR matters.
	COS_V2_00014391	4/7/2021	<Fornas, Stephanie>			<frong.michael@seattle.gov>   <zabrina.wilkinson@seattle.gov>			RE: AC Privilege - Response to Stacy Irwin, Please Review	RE: AC Privilege - Response to Stacy Irwin, Please Review	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
	COS_00012091	5/5/2021				<frong.michael@seattle.gov>   <fron.michael@seattle.gov>			RE: Response to SEEC Investigation	RE: Response to SEEC Investigation	Yes	Attorney Client / Work Product	Internal email to counsel requesting legal advice in anticipation of litigation re: response to public records requests.
	COS_00011496	3/5/2021				<chen.michelle@seattle.gov>   <michelle.chen@seattle.gov>			RE: Brooks Appeal # 64965	RE: Brooks Appeal # 64965	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
	COS_V2_00014394	4/7/2021	<Jones, Camille>			<frong.michael@seattle.gov>   <zabrina.wilkinson@seattle.gov>			RE: AC Privilege - Response to Stacy Irwin, Please Review	RE: AC Privilege - Response to Stacy Irwin, Please Review	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
	COS_00012033	5/5/2021	<Chen, Michelle>			<frong.michael@seattle.gov>   <michael.fong@seattle.gov>			FW: Response to SEEC Investigation	FW: Response to SEEC Investigation	Yes	Attorney Client / Work Product	Email reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
	COS_00012039	1/22/2020				<Jones, Camille>   <Fornas, Stephanie>			RE: AC Privilege - Response to Stacy Irwin, Please Review	RE: AC Privilege - Response to Stacy Irwin, Please Review	Yes	Attorney Client / Work Product	Internal email from counsel providing and reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
	COS_V2_00014398	4/7/2021				<Fornas, Stephanie>   <Wilkinson, Sabrina>			RE: AC Privilege - Response to Stacy Irwin, Please Review	RE: AC Privilege - Response to Stacy Irwin, Please Review	Yes	Attorney Client / Work Product	Internal email to counsel for purpose of seeking legal advice, in anticipation of litigation re: HR matters.
	COS_V2_00014401	4/7/2021	<Jones, Camille>			<stephanie.fornas@seattle.gov>   <Wilkinson, Sabrina>			AC Privilege - Response to Stacy Irwin, Please Review	AC Privilege - Response to Stacy Irwin, Please Review	Yes	Attorney Client / Work Product	Internal email to counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
	COS_00012963	2/9/2021							Additional Info - Emails.pdf	Additional Info - Emails.pdf	Yes	Attorney Client / Work Product	Internal email from counsel providing and reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
	COS_00013340	5/10/2021							Michelle Chen Letter to Barnet SEEC 05-10-21.pdf	Michelle Chen Letter to Barnet SEEC 05-10-21.pdf	Yes	Attorney Client / Work Product	Letter from counsel reflecting legal advice re: response to public records requests.
	COS_00013346	5/4/2021							Response to Ramsey Ramerman.pdf	Response to Ramsey Ramerman.pdf	Yes	Attorney Client / Work Product	Draft correspondence reflecting legal advice and strategy in anticipation of litigation re: response to public records requests.
	COS_V2_00014465	6/22/2021	<Wilkinson, Sabrina>			<stephanie.fornas@seattle.gov>   <Jones, Camille>			RE: AC Privilege - Stacy Irwin Resignation Letter	RE: AC Privilege - Stacy Irwin Resignation Letter	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
	COS_00013351	2/23/2021							RE: Update Text Message PDR's Jessica Traulman email to me re interpretation.pdf	RE: Update Text Message PDR's Jessica Traulman email to me re interpretation.pdf	Yes	Attorney Client / Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
	COS_V2_00014467	6/22/2021	<Jones, Camille>			<stephanie.fornas@seattle.gov>   <Wilkinson, Sabrina>			RE: AC Privilege - Stacy Irwin Resignation Letter	RE: AC Privilege - Stacy Irwin Resignation Letter	Yes	Attorney Client / Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
	COS_V2_00014470	6/22/2021				<michael.fong@seattle.gov>   <Jones, Camille>   <stephanie.fornas@seattle.gov>   <zabrina.wilkinson@seattle.gov>			RE: AC Privilege - Stacy Irwin Resignation Letter	RE: AC Privilege - Stacy Irwin Resignation Letter	Yes	Attorney Client / Work Product	Internal email to counsel seeking legal advice, and draft email to counsel for purpose of seeking legal advice, in anticipation of litigation re: HR matters.

Privilege Log  
 City Productions 1-10, 12  
 Ivin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
						From: Michael Fenton <michael.fenton@seattle.gov> To: Sharon Williams <sharon.williams@seattle.gov> Cc: Zachraa Wilkerson <zachraa.wilkerson@seattle.gov>			RE: ACP PRIVILEGED - response to Stacy Letter	RE: ACP PRIVILEGED - response to Stacy Letter	Yes	Attorney Client	Internal email to counsel for purposes of seeking legal advice and attaching a document to seek legal advice and in anticipation of litigation re: HR matters.
COS_V2_00014471		6/22/2021	<camille.jones@seattle.gov>			From: Sharon Williams <sharon.williams@seattle.gov> To: Michael Fenton <michael.fenton@seattle.gov> Cc: Zachraa Wilkerson <zachraa.wilkerson@seattle.gov>			AC Privilege - Stacy Ivin Resignation Letter	SEEC report final.pdf	Yes	Attorney Client	Memorandum reflecting legal advice re: response to public records requests.
COS_00014471	COS_00012145	5/6/2021	<camille.jones@seattle.gov>	RKarama					RE: Schwartz ***AC***	RE: Schwartz ***AC***	Yes	Attorney Client	Internal emails to and from counsel requesting legal advice re: response to public records requests.
COS_00010755	COS_00010758	10/5/2020	<aaron.valia@seattle.gov>			<kimberly.ferrero@seattle.gov>			RE: Schwartz ***AC***	RE: Schwartz ***AC***	Yes	Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00010753		7/28/2020		Bues Carolyn	Valia, Aaron				Personal Checklist.docx	Personal Checklist.docx	Yes	Attorney Client	Internal email to counsel requesting legal advice re: response to public records requests.
COS_00010752	COS_00010763	1/15/2021	<fernieo.kimberly@seattle.gov>			From: Stacy Ivin <stacy.ivin@seattle.gov> To: Aaron Valia <aaron.valia@seattle.gov>			RE: Moritz PDR 59632 - ACP Communication	RE: Moritz PDR 59632 - ACP Communication	Yes	Attorney Client	Internal email to and from counsel requesting legal advice re: response to public records requests.
COS_00010754		7/29/2020		Bues Carolyn	Valia, Aaron				Personal Checklist.docx	Personal Checklist.docx	Yes	Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00010764	COS_00010765	1/15/2021	<ivm.stacy@seattle.gov>			<aaron.valia@seattle.gov>	<fernieo.kimberly@seattle.gov>		Moritz PDR 59632 - ACP Communication	Moritz PDR 59632 - ACP Communication	Yes	Attorney Client	Internal email to counsel requesting legal advice re: response to public records requests.
COS_00010759	COS_00010761	10/2/2020	<aaron.valia@seattle.gov>			<kimberly.ferrero@seattle.gov>			RE: Schwartz ***AC***	RE: Schwartz ***AC***	Yes	Attorney Client	Internal email to and from counsel requesting and providing legal advice re: response to public records requests.
COS_00010746	COS_00010752	10/13/2020	<heidman.jessica@seattle.gov>			<kimberly.ferrero@seattle.gov>			PRIVILEGED	PRIVILEGED	Yes	Attorney Client	Internal email to and from counsel requesting and providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00005495		2/10/2020	<jones.camille@seattle.gov>			<wilkinson.zachraa@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED	Yes	Attorney Client	Internal email to counsel for purposes of providing legal advice re: HR matters.
COS_00005404	COS_00005405	2/5/2020	<camille.jones@seattle.gov>			<chloe.chen@seattle.gov>	<zachraa.wilkerson@seattle.gov>		RE: ACP Privilege - [redacted]	RE: ACP Privilege - [redacted]	Yes	Attorney Client	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00004942		1/17/2020	<jones.camille@seattle.gov>			<olien.michael@seattle.gov>	<paull.olsen@seattle.gov>		AC Privileged Meeting: Mayor's Office PIO Issue	AC Privileged Meeting: Mayor's Office PIO Issue	Yes	Attorney Client	Internal email to counsel for purposes of seeking legal advice regarding HR matters.
COS_00005096		11/8/2019				<chloe.chen@seattle.gov>			RE: ACP Privilege - Letter + Talking Points	RE: ACP Privilege - Letter + Talking Points	Yes	Attorney Client	Internal email to counsel seeking legal advice, and draft email to counsel reflecting and seeking Work Product.
COS_00005098		11/8/2019				<paull.olsen@seattle.gov>			RE: ACP Privilege - Letter + Talking Points	RE: ACP Privilege - Letter + Talking Points	Yes	Attorney Client	Draft correspondence provided to counsel for purpose of providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_V2_00014308	COS_V2_000143	4/14/2020	<camille.jones@seattle.gov>	Jones, Camille	Jones, Camille	<chloe.chen@seattle.gov>			AC Privilege - RE: Vacation Time	AC Privilege - RE: Vacation Time	Yes	Attorney Client	Draft internal email to counsel for purposes of providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00005753		3/21/2020				<wilkinson.zachraa@seattle.gov>			AC Privilege - Timeline for PIO Restructure, please review by 2/5	AC Privilege - Timeline for PIO Restructure, please review by 2/5	Yes	Attorney Client	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS_00005441		2/12/2020	<camille.jones@seattle.gov>			<wilkinson.zachraa@seattle.gov>			RE: ACP Privilege - Zachraa, Camille, Michelle - moved to 4:30pm	RE: ACP Privilege - Zachraa, Camille, Michelle - moved to 4:30pm	Yes	Attorney Client	Internal email to counsel for purposes of seeking legal advice regarding HR matters.
COS_V2_00014268	COS_V2_000142	2/27/2020	<camille.jones@seattle.gov>			<chloe.chen@seattle.gov>	<wilkinson.zachraa@seattle.gov>		RE: ACP PRIVILEGED - response to Stacy Letter	RE: ACP PRIVILEGED - response to Stacy Letter	Yes	Attorney Client	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.

Privilege Log  
 City Productions 1-10, 12  
 Irwin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
COS 00005442		2/12/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Zahraa.Wilkinson@seattle.gov>			AC Privilege - for discussion	AC Privilege - for discussion		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS VZ 00014314	COS VZ 000143	4/29/2020				<Michelle.Chen@seattle.gov>   <Zahraa.Wilkinson@seattle.gov>			RE: AC Privilege - RE: Vacation Time	RE: AC Privilege - RE: Vacation Time	Yes	Attorney Client / Work Product	Draft internal email re strategy and draft email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005377		1/30/2020				<Zahraa.Wilkinson@seattle.gov>			AC Privilege - Job Openings	AC Privilege - Job Openings		Attorney Client	Draft internal email to counsel for purposes of seeking legal advice re: HR matters.
COS 00005713		3/6/2020				<Wilkinson, Zahraa <Zahraa.Wilkinson@seattle.gov>			RE: AC Privilege - Talking Point SPD Opportunities	Re: AC Privilege - Talking Point SPD Opportunities		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005089		11/6/2019				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Olsen, Paul <Paul.Olsen@seattle.gov>			AC Privilege - Consult Tomorrow	AC Privilege - Consult Tomorrow		Attorney Client	Draft internal email to counsel for purposes of seeking legal advice re: HR matters.
COS 00005399		2/4/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>			RE: AC PRIVILEGED	RE: AC PRIVILEGED		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005247		12/22/2019				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Olsen, Paul <Paul.Olsen@seattle.gov>			RE: AC Privilege - Letter + Talking Points - drafts	RE: AC Privilege - Letter + Talking Points - drafts		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005248		11/17/2019										Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005249		11/17/2019										Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005709		3/6/2020				<Wilkinson, Zahraa <Zahraa.Wilkinson@seattle.gov>			AC Privilege - Talking Point SPD Opportunities	AC Privilege - Talking Point SPD Opportunities		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS VZ 00014320	COS VZ 000143	4/29/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Olsen, Paul <Paul.Olsen@seattle.gov>			AC Privilege - RE: Vacation Time	AC Privilege - RE: Vacation Time	Yes	Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00004945		11/17/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>			AC Privileged Meeting: Mayor's Office PIO Issue	AC Privileged Meeting: Mayor's Office PIO Issue		Attorney Client	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS VZ 00014180	COS VZ 0001418	2/27/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Wilkinson, Zahraa <Zahraa.Wilkinson@seattle.gov>			RE: AC PRIVILEGED	RE: AC PRIVILEGED	Yes	Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005457	COS 00005459	2/19/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Wilkinson, Zahraa <Zahraa.Wilkinson@seattle.gov>			RE: AC Privilege - [redacted]	RE: AC Privilege - [redacted]	Yes	Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005378		1/30/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>			AC Privilege - Job Openings	AC Privilege - Job Openings		Attorney Client	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005751		3/15/2020				<Chen, Michelle <Michelle.Chen@seattle.gov>   <Wilkinson, Zahraa <Zahraa.Wilkinson@seattle.gov>			AC Privilege - next steps Irwin, please review	AC Privilege - next steps Irwin, please review		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00005290	COS VZ 00014567	11/6/2019				<Chen, Michelle <Michelle.Chen@seattle.gov>			RE: AC Privilege - Letter + Talking Points	Re: AC Privilege - Letter + Talking Points		Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00010700		1/25/2021							AC Privilege - Talking Point SPD Opportunities	AC Privilege - Talking Point SPD Opportunities		Attorney Client	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00010693		1/6/2021							AC Privilege - next steps Irwin, please review	AC Privilege - next steps Irwin, please review		Attorney Client	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00010417		6/1/2017							AC Privilege - Letter + Talking Points	case: 164EO202110.pdf	Yes	Attorney Client / Work Product	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.
COS 00010427		12/7/2018							AC Privilege - Letter + Talking Points	case: 164EO202110.pdf	Yes	Attorney Client	Draft internal email to counsel for purposes of seeking legal advice in anticipation of litigation re: HR matters.



City of Seattle  
*In re: City of Seattle*  
 KOSC No. 21-2-11739-9 SEA

Baglines	EndDates	Document Date	From	Meeting Office Property - Author	Meeting Office Property - Last Author Saved By	To	CC	BCC	Subject	Meeting File Name	Redactions?	Privilege Type	Privilege Description
COS 00010482		6/25/2019		Nadelman, Jessica	Nadelman, Jessica					PAR Amendments and HR Review PPT training - HR records (Nadelman, Jessica) (Nadelman, Jessica) (Nadelman, Jessica).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010428		6/29/2018		Redding, Erica	Franklin, Erica R					PAR and HR Records (March 2020).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010553		3/23/2020		Nadelman, Jessica	Valla, Aaron					PAR and HR Records (March 2020).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010426		1/23/2018		Nadelman, Jessica	Nadelman, Jessica					MO Public Records pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010561		8/1/2020		Nadelman, Jessica	Valla, Aaron					PAR and HR records (September 2020).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010692		3/2/2021		Franklin, Erica R	Valla, Aaron					fas-gra-training-pptc-101 - 020221.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010556		6/22/2020		Nadelman, Jessica	Valla, Aaron					ACP WIP PDC - 6-2020 - ACP.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010557		6/22/2020		Susan Williams	Susan Williams					Microsoft Word Document.docx		Attorney Client	Word document prepared under the direction of counsel providing legal advice pertaining to public records requests.
COS 00010558		6/22/2020		Susan Williams	Lawlsher2					Microsoft Word Document.docx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010483		6/26/2019		Franklin, Erica R	Valla, Aaron					PDC 101 (AUV - Working) Print Version.pptx - HR records (Nadelman, Jessica) (Nadelman, Jessica) (Nadelman, Jessica).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010491		6/11/2019		Redding, Erica	Nadelman, Jessica					PDC 101 (EF - 9-5-18).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010429		8/6/2018		Franklin, Erica R	Franklin, Erica R					Training - where to find exemptions.pptx		Attorney Client	Draft memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010559		8/11/2020		Valla, Aaron	Valla, Aaron					Presentation2.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010423		11/8/2017		Valla, Aaron	Valla, Aaron					2017_11_08 training.docx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010424		11/9/2017		Valla, Aaron	Valla, Aaron					ACP AWP PDC training.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010420		10/4/2017		Susan Williams	Nadelman, Jessica					Microsoft Word Document.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010421		10/4/2017		Susan Williams	Susan Williams					Microsoft Word Document.docx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010413		12/20/17		Franklin, Erica R	Franklin, Erica R					PDC 101 Powerpoint - Exemptions.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010416		6/23/2017		Franklin, Erica R	Franklin, Erica R					PDC 101 - original version.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010418		6/13/2017		Franklin, Erica R	Franklin, Erica R					PDC 101 - 5/23 version.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010485		6/23/2019		Nadelman, Jessica	Nadelman, Jessica					ACP WIP CAO CLE FINAL.pptx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010486		6/23/2019		Susan Williams	Susan Williams					Microsoft Word Document.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010487		6/23/2019		Susan Williams	Lawlsher2					Microsoft Word Document.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010488		6/23/2019		Nadelman, Jessica	Nadelman, Jessica					ACP WIP CAO CLE (1).pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010489		6/23/2019		Susan Williams	Susan Williams					Microsoft Word Document.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010490		6/23/2019		Susan Williams	Lawlsher2					Microsoft Word Document.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010425		11/9/2017		Valla, Aaron	Valla, Aaron					2017_11_08 training.docx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010560		8/25/2020		Valla, Aaron	Valla, Aaron					Identifying Exemptions - 8_25_2020.pptx		Attorney Client	Word document prepared by counsel providing legal advice re: response to public records requests.

City Productions 1-10, 12  
 In/In, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Meeting Office Property - Author	Meeting Office Property - Last Author Saved By	To	CC	BCC	Subject	Meeting File Name	Redactions?	Privilege Type	Privilege Description
COS_00010414		12/28/2017		Redding, Erica	Nadelman, Jessica					PDR ppt - SPHR .pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS_00010565		1/11/2020		Valla, Aaron	Valla, Aaron				2020 PRA Legislative update - ACP .xlsx			Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS_00010419		1/23/2017		Franklin, Erica R	Valla, Aaron				PDR 101 (2017.08.30).pptx			Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS_00010415		4/17/2017		Nadelman, Jessica	Nadelman, Jessica				Text messaging and PRA.docx			Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00010701		1/28/2022		Franklin, Erica R	Valla, Aaron				fas-cpra-training-pdr-101 - 04/25/21.pptx			Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00010554		1/22/2020		Bones, Carolyn	Valla, Aaron				Personal Checklist.docx			Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00010562		1/02/2020		Nadelman, Jessica	Valla, Aaron				PRA and HR Records - Deep Dive (October 2020).pptx			Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS_00010558		1/01/2021		Michelle Chen	Chen, Michelle				memo_personal_fish_-_in/In,10.9.19.19.19.docx		Yes	Attorney Client	Attorney memorandum reflecting legal advice of/and re: response to public records request.
COS_00010444		1/22/2020		Jones, Camille	Chen, Michelle				In/In, Ferrino Meeting - (002) attorney client privilege-Moien, 5AAGAFED-BE84-4BDB-4B.docx			Work Product	Memorandum reflecting planning and strategy in anticipation of litigation re: HR matters.
COS_00010445		1/07/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 65DF368B-6BF6-44F9-9C93.docx Mayor Phone Replacement and Text Messages - 10012020_57ECCD7BF-83FD-41FA-A87 (1).docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010446		1/16/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 10.docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010437		1/10/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 10.docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010380		1/21/2021		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 1.docx		Yes	Attorney Client	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records request.
COS_00010348		1/22/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 88483746-F80-4CC2-8FF4-F925847DAF.docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010387		1/22/2020		Jones, Camille	Chen, Michelle				Final Talking Points In/In, Ferrino Meeting - (002) attorney client privilege.docx			Work Product	Memorandum reflecting legal advice and strategy in anticipation of litigation re: HR matters.
COS_00010349		1/01/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 88483746-F80-4CC2-8FF4-F925847DAF (1).docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010382		1/16/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 11.docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010350		1/21/2021		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 7ECCD7BF-83FD-41FA-A87 (2).docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010351		1/16/2020		Alencastro, Reji	Chen, Michelle				Timeline of Mayor Phone Replacement and Text Messages - 4E4E9391-309D-4973-B2D6-8566.docx			Attorney Client	Memorandum to counsel, drafted by and at direction of counsel, seeking legal advice and reflecting legal advice in anticipation of litigation re: response to public records request.
COS_00010388		1/22/2021							FerrinoIn/InCh00012128.pdf		Yes	Work Product	Internal attorney memorandum reflecting legal advice re: HR matters.
COS_00010564		1/21/2020		Nadelman, Jessica	Nadelman, Jessica				hr-cpra-training-pra-amendments-and-hr-records2020.pdf			Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00010565		1/21/2020		Nadelman, Jessica	Nadelman, Jessica				hr-cpra-training-pra-amendments-and-hr-records.pdf			Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.

City of Seattle  
 City Productions 1-10, 12  
 Irwin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Mail Office Property - Author	Mail Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS 00010666		[1/21/7/2020]		Nedelman, Jessica	Nedelman, Jessica					hd-cpa-training-para-amendments-and-ht-recs.pptx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010667		[1/21/7/2020]		Howell Z						hd-cpa-personnel-checklist.pdf		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010702		[6/17/2022]		Boies, Carolyn	Valla, Aaron					Personal Checklist.docx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010686		[1/22/1/2020]		Franklin, Erica R	Lehocka-Howell, Zuzka					hd-cpa-training-esp-10.pptx		Attorney Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS 00010669		[1/21/7/2020]		Franklin, Erica R						hd-cpa-public-disclosure-officer-guidelines.pdf		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010670		[1/21/7/2020]		Nedelman, Jessica						hd-cpa-training-city-app-samp.pdf		Attorney Client	Power Point prepared by counsel providing legal advice re: response to public records requests.
COS 00010671		[1/21/7/2020]		Susan Williams	Lehocka-Howell, Zuzka					EmbeddedFig2.docx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010672		[1/21/7/2020]		Susan Williams	Lehocka-Howell, Zuzka					EmbeddedFig1.docx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010673		[1/21/7/2020]		Franklin, Erica R	Lehocka-Howell, Zuzka					hd-cpa-public-disclosure-officer-guidelines.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010709		[6/17/2022]		KIPP, Julie	KIPP, Julie					STANDING REQUESTS.docx		Attorney Client	Memorandum prepared by counsel providing legal advice pertaining to public records requests.
COS 00010680		[1/21/7/2020]		Lehocka-Howell, Zuzka						hd-cpa-training-emails-processing-bcc.pdf		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00010681		[1/21/7/2020]		Nedelman, Jessica	Valla, Aaron					hd-cpa-training-para-amendments-and-ht-recs(6/20/20).pptx		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010710		[6/17/2022]		Howell Z						P File Checklist.pdf		Attorney Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS 00010684		[1/21/7/2020]		Lehocka-Howell, Zuzka	Lehocka-Howell, Zuzka					hd-cpa-training-emails-processing-bcc.docx		Attorney Client	Memorandum prepared under the direction of counsel providing legal advice re: response to public records requests.
COS 00012061		[5/7/2022]								Excerpts.pdf	Yes	Attorney Client	Memorandum reflecting legal advice re: response to public records requests.
COS 00012097		[5/6/2021]		From: Michael MOS, MA.110<mmos_ma110@seattle.gov>		Boies, Carolyn<carolyn.boies@seattle.gov>  <stefhanie.boies@seattle.gov>			AC Privileged FW: Excerpts	AC Privileged FW: Excerpts	Yes	Attorney Client	Internal email to counsel seeking and reflecting legal advice re: response to public records requests.
COS 00012099		[5/7/2022]								Excerpts.pdf	Yes	Attorney Client	Memorandum reflecting legal advice re: response to public records requests.
COS 00012551		[5/10/2021]		Angela Trinh						Michelle Chen Letter to Barnett SEEC 05-10-21.pdf	Yes	Attorney Client	Letter from counsel reflecting legal advice re: response to public records requests.
COS 00012557		[2/9/2021]								Additional Info - Emails.pdf	Yes	Attorney Client	Internal email from counsel providing legal advice and reflecting legal advice and attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS 00012943		[5/4/2021]		Chen, Michelle						Response to Ramser Ramerman.pdf	Yes	Attorney Client	Draft correspondence reflecting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS 00012101		[5/6/2021]		From: Michael MOS, MA.110<michael_mos_ma110@seattle.gov>		Boies, Carolyn<carolyn.boies@seattle.gov>			FW: Case No. 21-WB-0304-1	FW: Case No. 21-WB-0304-1	Yes	Attorney Client	Internal email to counsel seeking legal advice re: response to public records requests.
COS 00012103		[5/6/2021]		Ramerna						SEEC report final.pdf	Yes	Attorney Client	Memorandum reflecting legal advice re: response to public records requests.
COS_V2_00014473		[6/22/2021]		From: Michael MOS, MA.110<michael_mos_ma110@seattle.gov>		Thomas, Stephanie<stephanie.thomas@seattle.gov>			RE: AC Privilege - Stacy Irwin Resignation Letter	RE: AC Privilege - Stacy Irwin Resignation Letter	Yes	Attorney Client	Internal email to counsel requesting legal advice in anticipation of litigation re: response to public records requests.

City  
Productions 11, 13-14  
Ivins, et al v. City of Seattle  
KOSC No. 21-2-11739-9 SEA

Bag Bates	End Bates	Document Date	From	Metadata Office Property - Author	Metadata Office Property - Last Author Saved By	To	CC	BCC	Subject	Metadata File Name	Redactions?	Privilege Type	Privilege Description
COS 00013972		10/9/2021	Ivins, Stacy <stacy.ivins@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: Brownstone PDR appeal of C046201 - inadvertent disclosure of ACP records	RE: Brownstone PDR appeal of C046201 - inadvertent disclosure of ACP records	Y	Attorney Client Work Product	Internal email from counsel reflecting legal advice and reflecting attorney mental impressions in anticipation of litigation re: response to public records request
COS 00013973		10/9/2021	Chen, Michelle <michelle.chen@seattle.gov>			Ivins, Stacy <stacy.ivins@seattle.gov>			Brownstone PDR appeal of C046201 - inadvertent disclosure of ACP records	Brownstone PDR appeal of C046201 - inadvertent disclosure of ACP records	Y	Attorney Client Work Product	Internal email from counsel reflecting legal advice and reflecting attorney mental impressions in anticipation of litigation re: response to public records request
COS 00014065		10/9/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Chen, Michelle <michelle.chen@seattle.gov>			RE: AC Privilege - next steps Ivins, Stacy <stacy.ivins@seattle.gov>	RE: AC Privilege - next steps Ivins, Stacy <stacy.ivins@seattle.gov>		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00015527		9/5/2021		Ramenema									
COS 00022590		6/4/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>			Washington, Tiffany <tiffany.washington@seattle.gov>	FW: Updated Text Message PDR s.pdf	Y	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00015129		5/14/2021	McLellan, Terry <terry.mclellan@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>			Attorney/Client Privileged Information (Ivins, S)	Attorney/Client Privileged Information (Ivins, S)		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022275		6/8/2021	McLellan, Terry <terry.mclellan@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00021323		6/2/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: AC Privilege Ivins MOA - Draft	RE: AC Privilege Ivins MOA - Draft		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00015953		5/11/2021	Humes, Bobby <bobby.humes@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022870		6/28/2021	Zahraa, Wilkison <zahraa.wilkinson@seattle.gov>			McLellan, Terry <terry.mclellan@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022871		6/23/2021	McLellan, Terry <terry.mclellan@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>			RE: Donated Sick Time - email from Stacy - AC Privilege	RE: Donated Sick Time - email from Stacy - AC Privilege	Y	Attorney Client Work Product	Internal email to and from counsel for purposes of seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00015007		5/10/2021	Formas, Stephanie <stephanie.formas@seattle.gov>			Humes, Bobby <bobby.humes@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00015010		5/10/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>			ATTORNEY CLIENT PRIVILEGED	ATTORNEY CLIENT PRIVILEGED		Attorney Client Work Product	Internal email from counsel providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
COS 00022873		6/28/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			McLellan, Terry <terry.mclellan@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.

City Privilege Log  
 City Productions 11, 13-14  
 Irwin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Request	End date	Document	From	Metadata Office	Property - Author	Metadata Office	Property - Last Author Saved By	To	CC	BCC	Subject	Metadata File Name	Redactions?	Privilege Type	Privilege Description
COS 00022521		6/4/2021	'Fromas, Stephanie' <stephanie.formas@seattle.gov>					'Jones, Camille' <jones.camille@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>	'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Zahraa, Wilkerson' <zahraa.wilkerson@seattle.gov>		RE: AC Privilege - Details Re: OED Assignment - MOA attached	RE: AC Privilege - Details Re: OED Assignment		Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00022874		6/28/2021	'McLellan, Terry' <terry.mclellan@seattle.gov>				'Lemke, Will' <will.lemke@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>	'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Jones, Camille' <jones.camille@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR-matters.
COS 00022952		6/4/2021	'Fromas, Stephanie' <stephanie.formas@seattle.gov>				'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>   'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>	'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>   'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>		RE: AC Privilege- Details Re: OED Assignment - MOA attached	RE: AC Privilege- Details Re: OED Assignment - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.	
COS 00022776		6/9/2021	'Lemke, Will' <will.lemke@seattle.gov>				'Jones, Camille' <jones.camille@seattle.gov>	'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>   'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00015616	COS 00015993	5/28/2021	'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>				'Jones, Camille' <jones.camille@seattle.gov>	'Jones, Camille' <jones.camille@seattle.gov>			RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00022593		6/4/2021	'Fromas, Stephanie' <stephanie.formas@seattle.gov>				'Lemke, Will' <will.lemke@seattle.gov>	'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>   'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>			AC Privilege - MOA attached	AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice re attached draft document and reflecting strategy in anticipation of litigation re: HR-matters
COS 00022954		6/4/2021	'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>				'Jones, Camille' <jones.camille@seattle.gov>	'Jones, Camille' <jones.camille@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Draft memorandum forwarded to counsel for purpose of seeking legal advice in anticipation of litigation re: HR-matters.
COS 00022955		6/4/2021	'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>				'Jones, Camille' <jones.camille@seattle.gov>	'Jones, Camille' <jones.camille@seattle.gov>			RE: AC Privilege- Irwin MOA - Final	RE: AC Privilege- Irwin MOA - Final		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR-matters.
COS 00022956		6/4/2021	'Lemke, Will' <will.lemke@seattle.gov>				'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>   'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>	'Fromas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Rivera, Maritza' <maritza.rivera@seattle.gov>   'Washington, Tiffany' <tiffany.washington@seattle.gov>   'Wilkerson, Zahraa' <zahraa.wilkerson@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00015994	COS 00016323	5/28/2021	'Fromas, Stephanie' <stephanie.formas@seattle.gov>				'Jones, Camille' <jones.camille@seattle.gov>	'Jones, Camille' <jones.camille@seattle.gov>			RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR-matters.
COS 00016324	COS 00016703	5/28/2021	'Fromas, Stephanie' <stephanie.formas@seattle.gov>				'Jones, Camille' <jones.camille@seattle.gov>	'Jones, Camille' <jones.camille@seattle.gov>			RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR-matters.

City Privilege Log  
 City Productions 11, 13-14  
 Inwitt, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Bates	End Bates	Document Date	From	Meta] Office Property - Author	Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	Meta] File Name	Redactions?	Privilege Type	Privilege Description
COS 0002277		6/9/2021	McLellan, Terry <terry.mclellan@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	<will.lemke@seattle.gov>   <Lun, Cheryl Y. > <cherylyun@seattle.gov>   McLellan, Terry <terry.mclellan@seattle.gov> <Rivera, Maritza > <rivera.maritza@seattle.gov>   >   <Wilkinson, Zahraa > <zahraa.wilkinson@seattle.g		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR-matters.
COS 0002278		6/9/2021	Lemke, Will <will.lemke@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached MOA for Loan of PFO from MO to HSD June 2021 attorney client privilege/2w/rd.docx		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR-matters and attached draft memorandum. Draft memorandum provided to counsel for purpose of receiving legal advice and in anticipation of litigation re: HR-matters.
COS 0002279		6/9/2021		Moore, Kate	Jones, Camille	Jones, Camille <camille.jones@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review	RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review		Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00015228		5/17/2021	Formas, Stephanie <stephanie.formas@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>   Jones, Camille <camille.jones@seattle.gov>   Rivera, Maritza <rivera.maritza@seattle.gov>	Washington, Tiffany <tiffany.washington@seattle.gov>		RE: AC Privilege - Details Re: OED	RE: AC Privilege - Details Re: OED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 0002257		6/4/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>   Jones, Camille <camille.jones@seattle.gov>   Rivera, Maritza <rivera.maritza@seattle.gov>	Lemke, Will <will.lemke@seattle.gov>   Formas, Stephanie <stephanie.formas@seattle.gov>   Rivera, Maritza <rivera.maritza@seattle.gov>		RE: AC Privilege - Details Re: OED	RE: AC Privilege - Details Re: OED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 0002258		6/4/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>   Jones, Camille <camille.jones@seattle.gov>   Rivera, Maritza <rivera.maritza@seattle.gov>   Washington, Tiffany <tiffany.washington@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00015112		5/13/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: AC Privilege - Retirement Eligibility	RE: AC Privilege - Retirement Eligibility		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 0002259		6/4/2021	Formas, Stephanie <stephanie.formas@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>   Jones, Camille <camille.jones@seattle.gov>   Rivera, Maritza <rivera.maritza@seattle.gov>   Washington, Tiffany <tiffany.washington@seattle.gov>			RE: AC Privilege - Details Re: OED	RE: AC Privilege - Details Re: OED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 0002260		6/4/2021	Formas, Stephanie <stephanie.formas@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>   Jones, Camille <camille.jones@seattle.gov>   Rivera, Maritza <rivera.maritza@seattle.gov>   Washington, Tiffany <tiffany.washington@seattle.gov>	Turnes, Bobby <bobby.turnes@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.g		RE: AC Privilege - Details Re: OED	RE: AC Privilege - Details Re: OED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 0002238		6/3/2021	Rivera, Maritza <maritza.rivera@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Stephanie, Formas <stephanie.formas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.g		RE: AC Privilege - Details Re: OED	RE: AC Privilege - Details Re: OED		Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00016705	COS 00017057	5/28/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>   Jones, Camille <camille.jones@seattle.gov>	Friedhof, Andrea <andrea.friedhof@seattle.gov>		RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR-matters.
COS 00021354		6/2/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: AC Privilege from MOA - Draft	RE: AC Privilege from MOA - Draft		Attorney Client   Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR-matters.
COS 00017058	COS 00017364	5/28/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>			RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR-matters.



City of Seattle  
 City Productions 11, 13-14  
 Inwitt, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Bagdates	Enddates	Document Date	From	Metadata Office Property - Author	Metadata Office Property - Last Author Saved By	To	CC	BCC	Subject	Metadata File Name	Redactions?	Privilege Type	Privilege Description
COS_00022289		6/3/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - Inwitt MOA - Final	MOA for Loan of PIO from MO to OED June 2021 attorney client privileged.zw/rck.docx		Attorney Client   Work Product	providing legal advice re attached draft document in anticipation of litigation re: HR matters.
COS_00022240		6/3/2021	Formas, Stephanie <stephanie.formas@seattle.gov>	Moore, Kate	Wilkinson, Zahraa	Jones, Camille <camille.jones@seattle.gov> Durkin, Jerry <jerry.durkin@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov> McClellan, Terry <terry.mcclellan@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached			Attorney Client   Work Product	Draft memorandum containing counsel's legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00022284		6/4/2021	Formas, Stephanie <stephanie.formas@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov> McClellan, Terry <terry.mcclellan@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached			Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
COS_00022288		6/9/2021	Lennie, Viji <vill.lennie@seattle.gov>			Jones, Camille <camille.jones@seattle.gov> McClellan, Terry <terry.mcclellan@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov> Scherer, Lin <lin.scherer@seattle.gov>		RE: AC Privilege - MOA attached			Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00015189	COS_00015191	5/14/2021	Humes, Bobby <bobby.humes@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		Re: ACP: Fw: Update	Re: ACP: Fw: Update	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00015113	COS_00015115	5/13/2021	Humes, Bobby <bobby.humes@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		ACP: Fw: Update	ACP: Fw: Update	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00022876		6/28/2021	Lennie, Viji <vill.lennie@seattle.gov>			Jones, Camille <camille.jones@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov> Turn, Cheryl Y <cheryl.turn@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached			Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00015116	COS_00015118	5/13/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Humes, Bobby <bobby.humes@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: ACP: Fw: Update	RE: ACP: Fw: Update	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00015372		6/30/2021	Durkin, Jerry <jerry.durkin@seattle.gov>			Kline, Julie <julie.kline@seattle.gov>	Fong, Michael <michael.fong@seattle.gov> Formas, Stephanie <stephanie.formas@seattle.gov>		Re: AC PRIV	Re: AC PRIV		Attorney Client   Work Product	Draft correspondence prepared by counsel in anticipation of litigation re: HR matters.
COS_00015373		5/7/2021			Kline, Julie	Durkin, Jerry	Fong, Michael <michael.fong@seattle.gov>		Re: AC PRIV	SEEC Response 7-2-21 Durkin, Jerry.docx		Attorney Client   Work Product	Draft correspondence prepared by counsel in anticipation of litigation re: HR matters.
COS_00014371		5/11/2021	Durkin, Jerry <jerry.durkin@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov>		RE: AC Privileged: Following-up	RE: AC Privileged: Following-up		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00022799	COS_00022802	6/23/2021	Jones, Camille <camille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege- DRAFT response email to editor	RE: AC Privilege- DRAFT response email to editor	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014877		4/23/2021	Jones, Camille <camille.jones@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - FW: ACP - Advice requested re Michelle Chen matter, one note timeline	RE: AC Privilege - FW: ACP - Advice requested re Michelle Chen matter, one note timeline		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00015252		5/11/2021	Jones, Camille <camille.jones@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED- notes Stacy phone call 5.18.2021	RE: ATTORNEY CLIENT PRIVILEGED- notes Stacy phone call 5.18.2021		Attorney Client   Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.
COS_00019092	COS_00019469	5/28/2021	Jones, Camille <camille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		Re: AC Privilege Fwd: Update? - latest response	Re: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014878		4/23/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Formas, Stephanie <stephanie.formas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov>		Re: AC Privilege - FW: ACP - Advice requested re Michelle Chen matter, one note timeline	Re: AC Privilege - FW: ACP - Advice requested re Michelle Chen matter, one note timeline		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.



City of Seattle  
 Inwitt, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Requester	End dates	Document Date	From	Metadata Office Property - Author	Metadata Office Property - Last Author Saved By	To	CC	BCC	Subject	Metadata File Name	Redactions?	Privilege Type	Privilege Description
COS 00013376		5/7/2021	"Dorian, Jenny" <sdan@seattle.gov>			Holmes, Peter <petr.holmes@seattle.gov>	"Dorian, Jenny" <sdan@seattle.gov>		RE: Investigative report/media statements	Re: Investigative report/media statements		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: responses to PRA requests.
COS 00013377		5/7/2021	"Formas, Stephanie" <stephanie.formas@seattle.gov>			Holmes, Peter <petr.holmes@seattle.gov>	"Dorian, Jenny" <sdan@seattle.gov>		RE: Investigative report/media statements	RE: Investigative report/media statements		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: responses to PRA requests.
COS 00021367		6/2/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Wilkinson, Zahraa" <zahraa.wilkinson@seattle.gov>	"Formas, Stephanie" <stephanie.formas@seattle.gov>		RE: AC Privilege Fwd: Update? - CJ notes 6.1.2021 conversation	RE: AC Privilege Fwd: Update? - CJ notes 6.1.2021 conversation	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022289		6/9/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Larntke, Will" <will.larntke@seattle.gov>	"Formas, Stephanie" <stephanie.formas@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Draft memorandum provided to counsel for receipt of legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022290		6/8/2021		Moore, Kate	Jones, Camille	"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		MOA for Loan of PIO from MO to June 2021 attorney client privilege.dzw.rck.docx	MOA for Loan of PIO from MO to June 2021 attorney client privilege.dzw.rck.docx		Attorney Client   Work Product	Draft memorandum provided to counsel for receipt of legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00014847		4/13/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Wilkinson, Zahraa" <zahraa.wilkinson@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		AC Privilege - HR/IO Update	AC Privilege - HR/IO Update		Attorney Client   Work Product	Internal email to and from counsel seeking and providing information in anticipation of litigation re: HR matters.
COS 00022241		6/3/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		Fwd: AC Privilege - Inwitt MOA - Final	Fwd: AC Privilege - Inwitt MOA - Final		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022242		6/3/2021		Moore, Kate	Wilkinson, Zahraa	"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		MOA for Loan of PIO from MO to OED June 2021 attorney client privilege.dzw.rck.docx	MOA for Loan of PIO from MO to OED June 2021 attorney client privilege.dzw.rck.docx		Attorney Client   Work Product	Draft memorandum reflecting counsel's legal advice and provided to counsel for receipt of legal advice in anticipation of litigation re: HR matters.
COS 00013385		5/11/2021	"Fong, Michael" <michael.fong@seattle.gov>			"Kline, Julie" <julie.kline@seattle.gov>	"Formas, Stephanie" <stephanie.formas@seattle.gov>		A/C Privileged: Questions	A/C Privileged: Questions		Attorney Client   Work Product	Internal email to and from counsel seeking legal advice in anticipation of litigation re: compliance with Seattle Municipal Code.
COS 00015025		5/10/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022285		6/4/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		RE: AC Privilege- Details Re: OED Assignment - MOA attached	RE: AC Privilege- Details Re: OED Assignment - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00022286		6/4/2021		Moore, Kate	Jones, Camille	"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		RE: AC Privilege- Details Re: OED Assignment - MOA attached	RE: AC Privilege- Details Re: OED Assignment - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS 00015026		5/10/2021	"Jones, Camille" <camille.jones@seattle.gov>			"Formas, Stephanie" <stephanie.formas@seattle.gov>	"Friedhoff, Andrea" <andrea.friedhoff@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.

City of Seattle  
 City Productions 11, 13-14  
 Invin, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

By/Date	End/Date	Document	From	Property - Author	Property - Last Author Saved By	Property - To	CC	BCC	Subject	Metadata Name	Redactions?	Privilege Type	Privilege Description
CCS 00022942	CCS 00022946	6/24/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege- DRAFT response email to letter	RE: AC Privilege- DRAFT response email to letter	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
CCS 00015379		5/12/2021	Fong, Michael <michael.fong@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			RE: AC Privileged: Following-up	RE: AC Privileged: Following-up		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters and responses to PRA requests.
CCS 00015483		4/26/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege - FY: ACP - Advice requested re Michele Chen matter, one side meeting	RE: AC Privilege - FY: ACP - Advice requested re Michele Chen matter, one side meeting		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00019594	CCS 00019947	5/28/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Re: Ac Privilege Fwd: Update? - latest response	Re: Ac Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00019988	CCS 00020294	5/28/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Re: Ac Privilege Fwd: Update? - latest response	Re: Ac Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00022947	CCS 00022951	6/24/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			RE: AC Privilege- DRAFT response email to letter	RE: AC Privilege- DRAFT response email to letter	Y	Attorney Client   Work Product	Internal email to and from counsel requesting and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00022952		6/24/2021	James, Camille <jcamille.jones@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			Re: Ac Privilege Fwd: Update? - latest response	Re: Ac Privilege Fwd: Update? - latest response		Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00015059		5/12/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00015380		5/12/2021	Fong, Michael <michael.fong@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			RE: AC Privileged: Following-up	RE: AC Privileged: Following-up		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00015407		5/10/2021	James, Camille <jcamille.jones@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00022903	CCS 00022907	6/23/2021	James, Stephanie <stephanie.fornas@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege- DRAFT response email to letter	RE: AC Privilege- DRAFT response email to letter	Y	Attorney Client   Work Product	Internal email to and from counsel requesting and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00022908		6/23/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privileged: Following-up	RE: AC Privileged: Following-up		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00023115	CCS 00023117	6/1/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege Fwd: Monday phone conversation	RE: AC Privilege Fwd: Monday phone conversation	Y	Attorney Client   Work Product	Internal email to and from counsel requesting legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00020295	CCS 00020647	5/28/2021	James, Camille <jcamille.jones@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Re: Ac Privilege Fwd: Update? - latest response	Re: Ac Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product	Internal email to and from counsel requesting legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00015480		4/23/2021	Friedhof, Andrea <andrea.friedhof@seattle.gov>			James, Camille <jcamille.jones@seattle.gov>			Re: AC Privilege - FY: ACP - Advice requested re Michele Chen matter, one side meeting	Re: AC Privilege - FY: ACP - Advice requested re Michele Chen matter, one side meeting		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
CCS 00015396		6/22/2021	Fong, Michael <michael.fong@seattle.gov>			James, Stephanie <stephanie.fornas@seattle.gov> Friedhof, Andrea <andrea.friedhof@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege- Stacy Invin Resignation Letter	RE: AC Privilege- Stacy Invin Resignation Letter	Y	Attorney Client   Work Product	Internal email to counsel requesting legal advice in anticipation of litigation re: HR matters.

City of Seattle  
 Inmiv, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Bagdates	Enddates	Document Date	From	Metadata Office Property - Author	Metadata Office Property - Last Author Saved By	To	CC	BCC	Subject	Metadata File Name	Redactions?	Privilege Type	Privilege Description
COS_00015381		5/12/2021	From: Michael Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			From: Stephanie Schorcher, John Smyth, Stephanie <stephanie.fornas@seattle.gov>	Sharif, Ghazal <ghazal.sharif@seattle.gov>		RE: AC Privilege- Following-up	RE: AC Privilege- Following-up		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters and
COS_00022665		6/22/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			From: Stephanie <stephanie.fornas@seattle.gov>	Stephanie, Fornas <stephanie.fornas@seattle.gov>		RE: AC Privilege- DRAFT response email to letter	RE: AC Privilege- DRAFT response email to letter		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters
COS_00022899		6/23/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			From: Stephanie Jones, Camille <stephanie.fornas@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege- DRAFT response email to letter	RE: AC Privilege- DRAFT response email to letter		Attorney Client   Work Product	Draft correspondence provided to counsel for receipt of legal advice and containing legal advice in anticipation of litigation re: HR matters.
COS_00022813		6/23/2021		Jones, Camille	Wilkinson, Zahraa	From: Stephanie <stephanie.fornas@seattle.gov>	Friedhoff, Andrea <andrea.friedhoff@seattle.gov>		RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response		Attorney Client   Work Product	Internal email to counsel requesting legal advice in anticipation of litigation re: HR matters.
COS_00020948		5/28/2021	Jones, Camille <camille.jones@seattle.gov>			From: Stephanie Fornas, Stephanie <stephanie.fornas@seattle.gov>	Humes, Bobby <bobby.humes@seattle.gov>		RE: AC Privilege Fwd: Monday phone conversation	RE: AC Privilege Fwd: Monday phone conversation		Attorney Client   Work Product	Internal email to and from counsel requesting and reflecting strategy in anticipation of litigation re: HR matters.
COS_00015028		5/10/2021	Friedhoff, Andrea <andrea.friedhoff@seattle.gov>			From: Stephanie Jones, Camille <camille.jones@seattle.gov>	Humes, Bobby <bobby.humes@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.
COS_00021330		6/1/2021	Fornas, Stephanie <stephanie.fornas@seattle.gov>			From: Stephanie Fornas, Stephanie <stephanie.fornas@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege Fwd: Monday phone conversation	RE: AC Privilege Fwd: Monday phone conversation		Attorney Client   Work Product	Internal email to and from counsel requesting and reflecting strategy in anticipation of litigation re: HR matters.
COS_00022814		6/23/2021	Jones, Camille <camille.jones@seattle.gov>			From: Stephanie Fornas, Stephanie <stephanie.fornas@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege- DRAFT response email to letter	RE: AC Privilege- DRAFT response email to letter		Attorney Client   Work Product	Draft correspondence provided to counsel for receipt of legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00022819		6/23/2021		Jones, Camille	Jones, Camille	From: Stephanie Fornas, Stephanie <stephanie.fornas@seattle.gov>	Fornas, Stephanie Friedhoff, Andrea <andrea.friedhoff@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00015029		5/10/2021	Jones, Camille <camille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Humes, Bobby <bobby.humes@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014625		4/22/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Fornas, Stephanie <stephanie.fornas@seattle.gov>		RE: AC Privilege- Fw: Letter of Resignation response	RE: AC Privilege- Fw: Letter of Resignation response		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014682		4/7/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: AC Privilege- RE: FMLA	RE: AC Privilege- RE: FMLA		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014682		3/19/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Tirani, Korde <korde.tirani@seattle.gov>	Tirani, Korde <korde.tirani@seattle.gov>		RE: AC Privilege- Retirement Eligibility	RE: AC Privilege- Retirement Eligibility		Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS_00014682		4/5/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		RE: AC Privilege - Timeline re: PIO for meeting tomorrow	RE: AC Privilege - Timeline re: PIO for meeting tomorrow		Attorney Client   Work Product	Internal email to and from counsel seeking legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014701		4/9/2021	Jones, Camille <camille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Friedhoff, Andrea <andrea.friedhoff@seattle.gov>		AC Privilege- Timeline re: Kim Farenio & Stacy Iwvin Communications March - April 2021	AC Privilege- Timeline re: Kim Farenio & Stacy Iwvin Communications March - April 2021		Attorney Client   Work Product	Internal email to and from counsel seeking legal advice and reflecting attorney mental impressions in anticipation of litigation re: HR matters.
COS_00014712		4/5/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Camille <camille.jones@seattle.gov>	Jones, Camille <camille.jones@seattle.gov>		FW: AC Privilege - Timeline re: PIO for meeting tomorrow	FW: AC Privilege - Timeline re: PIO for meeting tomorrow		Attorney Client   Work Product	Draft correspondence provided to counsel for receipt of legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00014069		6/23/2021		Jones, Camille	Jones, Camille				Response Letter- Stacy Iwvin 6/23/2021 attorney client privileged	Response Letter- Stacy Iwvin 6/23/2021 attorney client privileged		Attorney Client   Work Product	Draft correspondence provided to counsel for receipt of legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00014072		6/25/2021		Jones, Camille	Jones, Camille				Response Letter- Stacy Iwvin 6/23/2021 attorney client privileged	Response Letter- Stacy Iwvin 6/23/2021 attorney client privileged		Attorney Client   Work Product	Draft correspondence provided to counsel for receipt of legal advice and reflecting legal advice in anticipation of litigation re: HR matters.

City of Seattle  
 City Productions 11, 13-14  
 Inwiti, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Bag Dates	End Dates	Document Date	From	Property - Author	(Meta) Office Property - Last Author Saved By	To	CC	BCC	Subject	(Meta) File Name	Redactions?	Privilege Type	Privilege Description
COS 00015289	COS 00015270	5/20/2021	Carmille Jones@seattle.gov			Wilkinson, Zahraa Hurns, Bobby Wilkinson, Zahraa			RE: AC Privilege - Stacy Irwin Update draft	RE: AC Privilege - Stacy Irwin Update draft	Y	Attorney Client Work Product	Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters
COS 00015254	COS 00015257	5/11/2021	* Jones, Carmille <carmille.jones@seattle.gov>			<zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov>   Tun, Cherry Y <cherry.lun@seattle.gov>   McClain, Teri <teri.mcclain@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED- Bobby response to Stacy, please send	RE: ATTORNEY CLIENT PRIVILEGED- Bobby response to Stacy, please send	Y	Attorney Client Work Product	Internal email to counsel seeking and reflecting attorney mental impressions re: HR matters
COS 00022698		6/18/2021	Carmille Jones@seattle.gov			Lernke, Wif <will.lernke@seattle.gov>	Dejene, Kdst <kdst.dejene@seattle.gov>   Jones, Carmille <carmille.jones@seattle.gov>   Lernke, Wif <wif.lernke@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		Re: AC Privilege - MOA attached	Re: AC Privilege - MOA attached		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00014871		4/22/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Carmille <carmille.jones@seattle.gov>	Theresa, Niana <theresa.niana@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client Work Product	Internal email to and from counsel seeking legal advice and reflecting attorney mental impressions re: HR matters
COS 00015054		5/11/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Carmille <carmille.jones@seattle.gov>   Lernke, Wif <will.lernke@seattle.gov>   McClain, Teri <teri.mcclain@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters	
COS 00022307		6/11/2021	* Thomas, Stephanie <stephanie.thomas@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Tun, Cherry Y <cherry.lun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00022820	COS 00022822	6/23/2021	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			Jones, Carmille <carmille.jones@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - DRAFT response email re: ACP	RE: AC Privilege - DRAFT response email re: ACP	Y	Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00015119		5/13/2021	* Jones, Carmille <carmille.jones@seattle.gov>			Hiane, Bondi <bondi.hiane@seattle.gov>	Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - Retirement Eligibility AC Privilege - Talking Points>Email to Stacy	RE: AC Privilege - Retirement Eligibility AC Privilege - Talking Points>Email to Stacy		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00015121		5/13/2021	* Jones, Carmille <carmille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Dejene, Kdst <kdst.dejene@seattle.gov>   Carmille Jones <carmille.jones@seattle.gov>   Lernke, Wif <wif.lernke@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00014872		4/22/2021	* Zwiern, Steve <steve.zwiern@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Dejene, Kdst <kdst.dejene@seattle.gov>   Carmille Jones <carmille.jones@seattle.gov>   Lernke, Wif <wif.lernke@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00022931		6/30/2021	Jones, Carmille			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Dejene, Kdst <kdst.dejene@seattle.gov>   Carmille Jones <carmille.jones@seattle.gov>   Lernke, Wif <wif.lernke@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00014873		4/22/2021	* Zwiern, Steve <steve.zwiern@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephanie.formas@seattle.gov>   Rovera, Mariza <mariza.rovera@seattle.gov>   Washington, Tiffany <tiffany.washington@seattle.gov>   Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00022267		6/4/2021	* Jones, Carmille <carmille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Dejene, Kdst <kdst.dejene@seattle.gov>   Carmille Jones <carmille.jones@seattle.gov>   Lernke, Wif <wif.lernke@seattle.gov>		RE: AC Privilege- Details Re: OED Assignment - MOA attached	RE: AC Privilege- Details Re: OED Assignment - MOA attached		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00022243		6/3/2021	Carmille Jones@seattle.gov			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Dejene, Kdst <kdst.dejene@seattle.gov>   Carmille Jones <carmille.jones@seattle.gov>   Lernke, Wif <wif.lernke@seattle.gov>		Re: AC Privilege- Irwin MOA - Final	Re: AC Privilege- Irwin MOA - Final		Attorney Client Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting attorney mental impressions re: HR matters
COS 00022905		6/29/2021	* Jones, Carmille <carmille.jones@seattle.gov>			Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>   Theresa, Niana <theresa.niana@seattle.gov>   Lernke, Wif <will.lernke@seattle.gov>   Even@winibauerdiamond.com		AC Privilege - SHR Recommendation Letter to DMV Form, please review 6/30	AC Privilege - SHR Recommendation Letter to DMV Form, please review 6/30		Attorney Client Work Product	Email to counsel requesting legal advice re attached draft correspondence in anticipation of litigation re: HR matters.	



City Productions 11, 13-14  
Inm, et al v. City of Seattle  
KOSC No. 21-2-11739-9 SEA

Requester	Endstates	Document Date	From	Property - Author	(Meta) Office Property - Last Author Saved By	To	CC	BCC	Subject	(Meta) File Name	Redactions?	Privilege Type	Privilege Description
COS 00022247		6/3/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Rienra, Mandar' <mandar.rienra@seattle.gov>	'Formas, Stephanie' <stephanie.formas@seattle.gov>   'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - Details: Re: OED Assignment	Re: AC Privilege - Details: Re: OED Assignment		Attorney Client   Work Product	Internal email to counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS V2_00023050		5/28/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Mendoza, Nanea' <nanea.mendoza@seattle.gov>			AC Privilege Re: conversation	AC Privilege Re: conversation	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS V2_00023051		5/28/2021	'Jones, Camille' <camille.jones@seattle.gov>			'McLellan, Terry' <terry.mclellan@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>	'Formas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022501		6/15/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015078		5/11/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>			AC Privilege - No review for Stacy, 2020	AC Privilege - No review for Stacy, 2020		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015193	COS 00015195	5/14/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Humes, Bobby' <bobby.humes@seattle.gov>   'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>			RE: ATTORNEY CLIENT PRIVILEGED- Bobby response to Stacy, please send	RE: ATTORNEY CLIENT PRIVILEGED- Bobby response to Stacy, please send	Y	Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS 00015109		5/11/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>			RE: AC Privilege - No review for Stacy	RE: AC Privilege - No review for Stacy		Attorney Client   Work Product	Internal email to counsel seeking legal advice re: HR matters.
COS 00022248		6/3/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>			AC Privilege - Inm MOA - Final	AC Privilege - Inm MOA - Final		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022249		8/22/2021		Morel, Kate	Jones, Camille					Inm MOA - Draft docx		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022398		6/11/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Lanne, Wif' <willanne@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>   'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>	'Formas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'McLellan, Terry' <terry.mclellan@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022798		6/22/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Lanne, Wif' <willanne@seattle.gov>	'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015127		5/13/2021	'Harris, Ronald' <ronald.harris@seattle.gov>			'Jones, Camille' <camille.jones@seattle.gov>			RE: AC Privilege - Retirement Eligibility	RE: AC Privilege - Retirement Eligibility		Attorney Client   Work Product	Internal email requesting information for the purpose of facilitating request for legal advice re: HR matters.
COS 00022399		6/11/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Formas, Stephanie' <stephanie.formas@seattle.gov>			RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015110		5/12/2021	'Jones, Camille' <camille.jones@seattle.gov>			'Jones, Camille' <camille.jones@seattle.gov>	'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - No review for Stacy	RE: AC Privilege - No review for Stacy		Attorney Client   Work Product	Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015298	COS 00015241	5/17/2021	'Humes, Bobby' <bobby.humes@seattle.gov>			'Jones, Camille' <camille.jones@seattle.gov>   'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>	'Formas, Stephanie' <stephanie.formas@seattle.gov>   'Lun, Cherry Y' <cherry.lun@seattle.gov>   'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED- Bobby response to Stacy, please send	RE: ATTORNEY CLIENT PRIVILEGED- Bobby response to Stacy, please send	Y	Attorney Client   Work Product	Internal email to counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.
COS 00014874		4/22/2021	'Wilkinson, Zahraa' <zahraa.wilkinson@seattle.gov>			'Zwein, Steve' <steve.zwein@seattle.gov>	'Dunlap, Kater' <kater.dunlap@seattle.gov>   'Jones, Camille' <camille.jones@seattle.gov>   'St. Jennifer' <jennifer.st@seattle.gov>		RE: ACP - Advice requested re Michelle Chen matter	RE: ACP - Advice requested re Michelle Chen matter		Attorney Client	Internal email to and from counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.

City Productions 11, 13-14  
*Inwitt, et al v. City of Seattle*  
 KOSC No. 21-2-11739-9 SEA

BagDates	EndDates	Document Date	From	To	Property - Author	Meta Office Property - Last Author Saved By	CC	BCC	Subject	Meta File Name	Redactions?	Privilege Type	Privilege Description
COS_00022980	COS_00021296	5/28/2021	camille.jones@seattle.gov	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	McLellan, Terry' <terry.mclellan@seattle.gov>   Lun, Cheryl Y' <cherry.lun@seattle.gov>   Wilkinson, Zahraa'		RE: AC Privilege Fwd: Update? - latest response	RE: AC Privilege Fwd: Update? - latest response	Y	Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00022310		6/11/2021	camille.jones@seattle.gov	Formas, Stephanie'	Formas, Stephanie'	Formas, Stephanie'	Wilkinson, Zahraa'		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS_00014875		4/22/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - Advice requested re Michelle Chen matter	RE: AC Privilege - Advice requested re Michelle Chen matter		Attorney Client   Work Product:	Internal email to and from counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.	
COS_00015196	COS_00015199	5/14/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - response to Stacy, please email today	RE: AC Privilege - response to Stacy, please email today	Y	Attorney Client   Work Product:	Internal email to and from counsel requesting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.	
COS_00015200		5/14/2021	Jones, Camille'	Formas, Stephanie'	Formas, Stephanie'	Formas, Stephanie'		RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review	RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review		Attorney Client   Work Product:	Internal email to and from counsel requesting legal advice and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022902		6/28/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - No review for Stacy 2020	RE: AC Privilege - No review for Stacy 2020		Attorney Client   Work Product:	Internal email to and from counsel requesting and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.	
COS_00022827	COS_00022830	6/23/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - DRAFT response email to Blair	RE: AC Privilege - DRAFT response email to Blair	Y	Attorney Client   Work Product:	Internal email to and from counsel requesting and providing legal advice and reflecting strategy in anticipation of litigation re: attached draft correspondence and HR matters counsel for in anticipation of litigation re: HR matters.	
COS_00022831		8/3/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - Advice requested re Michelle Chen matter	RE: AC Privilege - Advice requested re Michelle Chen matter		Attorney Client   Work Product:	Internal email to and from counsel requesting legal advice and reflecting strategy in anticipation of litigation re: HR matters.	
COS_00014876		4/22/2021	Zakaria, Steve'	Formas, Stephanie'	Formas, Stephanie'	Formas, Stephanie'		RE: AC Privilege - Advice requested re Michelle Chen matter	RE: AC Privilege - Advice requested re Michelle Chen matter		Attorney Client   Work Product:	Internal email to and from counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: HR matters.	
COS_00015242		5/17/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review	RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review		Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting strategy and legal advice in anticipation of litigation re: HR matters.	
COS_00022659		6/18/2021	Lemke, Will'	Jones, Camille'	Jones, Camille'	Jones, Camille'		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product:	Internal email to counsel seeking legal advice and reflecting legal advice and attorney mental impressions in anticipation of litigation re: HR matters.	
COS_00015243		5/17/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review	RE: ATTORNEY CLIENT PRIVILEGED- Stacy Communications, Input + Review		Attorney Client   Work Product:	Internal email providing legal advice re: response to public records request.	
COS_00014904	COS_00014907	3/4/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		AC Privilege - FW: ACP OneNote	AC Privilege - FW: ACP OneNote	Y	Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.	
COS_00022270		6/4/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - Details Re: OED Assignment - MOA attached	RE: AC Privilege - Details Re: OED Assignment - MOA attached		Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting strategy in anticipation of litigation re: HR matters.	
COS_00022289		6/9/2021	Jones, Camille'	McLellan, Terry'	McLellan, Terry'	McLellan, Terry'		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00015201		5/14/2021	Jones, Camille'	Wilkinson, Zahraa'	Wilkinson, Zahraa'	Wilkinson, Zahraa'		RE: AC Privilege - Taking Points/Email to Stacy	RE: AC Privilege - Taking Points/Email to Stacy		Attorney Client   Work Product:	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.	

City of Seattle  
 City Productions 11, 13-14  
 Inwitt, et al v. City of Seattle  
 KOSC No. 21-2-11739-9 SEA

Request	End date	Document Date	From	(Meta) Office Property - Author	(Meta) Office Property - Last Author Saved By	To	CC	BCC	Subject	(Meta) File Name	Redactions?	Privilege Type	Privilege Description
COS_00015128		5/13/2021	Niana, Ronda *ronda.niana@seattle.gov*			*Jones, Camille <camille.jones@seattle.gov> *McLellan, Terry <terry.mclellan@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Rivera, Maritza <maritza.rivera@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - Retirement Eligibility	RE: AC Privilege - Retirement Eligibility		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022311		6/11/2021	Lernke, Wif *wif.lernke@seattle.gov*			*Jones, Camille <camille.jones@seattle.gov> *Lernke, Wif <wif.lernke@seattle.gov>	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Rivera, Maritza <maritza.rivera@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022300		6/9/2021	*Jones, Camille <camille.jones@seattle.gov>			Lernke, Wif *wif.lernke@seattle.gov*	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022660		6/18/2021	camille.jones@seattle.gov			Lernke, Wif *wif.lernke@seattle.gov*	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022901		6/9/2021	*Jones, Camille <camille.jones@seattle.gov>			*Lernke, Wif <wif.lernke@seattle.gov> *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Rivera, Maritza <maritza.rivera@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022866	COS_00022860	6/24/2021	*Jones, Camille <camille.jones@seattle.gov>			*Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			RE: AC Privilege - DRAFT response email to letter- please confirm	RE: AC Privilege - DRAFT response email to letter- please confirm	Y	Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00022861		18/3/2021		Jones, Camille	Jones, Camille					Response Letter- Stacy Irwin 6.23.2021 attorney client privileged 0021.docx		Attorney Client   Work Product   Draft correspondence provided to attorney for the purpose of receiving legal advice and reflecting strategy in anticipation of litigation re: HR matters.	
COS_00022302		6/9/2021	*McLellan, Terry <terry.mclellan@seattle.gov>			*Jones, Camille <camille.jones@seattle.gov> *Lernke, Wif <wif.lernke@seattle.gov> *McLellan, Terry <terry.mclellan@seattle.gov> *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *Rivera, Maritza <maritza.rivera@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	
COS_00015394		5/21/2021	*Jones, Camille <camille.jones@seattle.gov>			*Niana, Niana <niana.niana@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>			AC Privilege - WBMO Issue Update	AC Privilege - WBMO Issue Update		Attorney Client   Work Product   Internal email to counsel seeking legal advice and reflecting strategy in anticipation of litigation re: HR matters.	
COS_00015425		5/19/2021	*Fong, Michael <michael.fong@seattle.gov>			*Kline, Julie <julie.kline@seattle.gov>   *Lernke, Wif <wif.lernke@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *Friedrich, Andrea <andrea.friedrich@seattle.gov>   *Jones, Camille <camille.jones@seattle.gov>		AC Privileged: Questions	AC Privileged: Questions		Attorney Client   Work Product   Internal email to counsel seeking legal advice in anticipation of litigation re: HR matters.	
COS_00022303		6/9/2021	*Jones, Camille <camille.jones@seattle.gov>			*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	*Thomas, Stephanie <stephanie.thomas@seattle.gov>   *Lum, Cherry Y. <cherry.lum@seattle.gov>   *McLellan, Terry <terry.mclellan@seattle.gov>   *Rivera, Maritza <maritza.rivera@seattle.gov>   *Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product   Internal email to and from counsel seeking and reflecting legal advice in anticipation of litigation re: HR matters.	



City of Seattle  
City Productions 11, 13-14  
Irvine, et al v. City of Seattle  
KOSC No. 21-2-11739-9 SEA

Requester	End dates	Document Date	From	Property - Author	Property - Last Author Saved By	Property - To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS 00022905		6/9/2021	Lemke, Will willlemke@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov> McLellan, Terry <terry.mclellan@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022903		6/22/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov> Turnke, Will <willturnke@seattle.gov> Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022902		6/16/2021	Lemke, Will willlemke@seattle.gov Wilkinson, Zahraa zahraa.wilkinson@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov> McLellan, Terry <terry.mclellan@seattle.gov> Wilkinson, Zahraa <zahraa.wilkinson@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00019566		5/11/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Friedrich, Andrea <andrea.friedrich@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation of litigation re: HR matters.
COS 00021796		6/22/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Friedrich, Andrea <andrea.friedrich@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015202		5/14/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015203		5/14/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: ATTORNEY CLIENT PRIVILEGED	RE: ATTORNEY CLIENT PRIVILEGED	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015428		5/21/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022271		6/4/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022904		6/22/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		RE: AC Privilege - MOA attached	RE: AC Privilege - MOA attached		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00015430		5/21/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov> Turn, Cheryl Y. <cheryl.yun@seattle.gov>		AC Privilege - Slidy DRAFT Response	AC Privilege - Slidy DRAFT Response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022233		6/2/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov>		AC Privilege - Slidy DRAFT Response	AC Privilege - Slidy DRAFT Response		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022234		6/2/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov>		AC Privilege - Slidy DRAFT Response	AC Privilege - Slidy DRAFT Response		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022235		6/2/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov>		AC Privilege - Slidy DRAFT Response	AC Privilege - Slidy DRAFT Response		Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022832		6/2/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov>		AC Privilege - Slidy DRAFT Response	AC Privilege - Slidy DRAFT Response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.
COS 00022836		6/2/2021	Jones, Camille jcamille.jones@seattle.gov			Jones, Camille <jcamille.jones@seattle.gov>	Formas, Stephanie <stephane.formas@seattle.gov>		AC Privilege - Slidy DRAFT Response	AC Privilege - Slidy DRAFT Response	Y	Attorney Client   Work Product	Internal email to and from counsel seeking and providing legal advice and reflecting legal advice in anticipation of litigation re: HR matters.



City Productions 1, 5, 15  
 Iwun, et al v. City of Seattle  
 KCSC No. 21-2-11739-9 SEA

BagDates	EndDates	Document Date	From	Internal Office Property - Author	Internal Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_00001969	COS_00001968	5/6/2021							RE: "AC" Text Question		Y	Attorney/Client	Memorandum reflecting legal advice re: response to public records requests.
COS_00001716	COS_00001717	5/6/2021	Nadehan, Jessica <jessica.nadehan@seattle.gov			Ramsey, Ramerman <ramseyramerman@gmail.com>			FW: Updated Text Message PDR's		Y	Attorney/Client	Internal email from counsel providing legal advice and reflecting attorney mental impressions in anticipation of litigation re: response to public records request and HR matters.
COS_00001718	COS_00001723	10/9/2020	Chen, Michelle			Nadehan, Jessica	Fornas, Stephanie   Sharifi, Ghazal   Gresheng, Joseph		RE: "AC" Text Question		Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records request and other litigation involving the City.
COS_00001724	COS_00001725	2/23/2021	Nadehan, Jessica			Chen, Michelle			RE: Updated Text Message PDR's		Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00001726	COS_00001723	3/25/2021	Valla, Aaron			Chen, Michelle   Kipp, Julie			RE: ATTORNEY/CLIENT PRIVILEGED		Y	Attorney/Client   Work Product	Internal email from and to counsel providing and seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation involving the City.
COS_00001734	COS_00001743	3/1/2021	Valla, Aaron			Chen, Michelle			RE: TEAMS Follow-up Meeting - Swaminathan/Mkoyr Sarf-- ACP		Y	Attorney/Client   Work Product	Internal email from and to counsel providing and seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation involving the City.
COS_00001744	COS_00001750	3/1/2021	Valla, Aaron			Chen, Michelle			RE: TEAMS Follow-up Meeting - Swaminathan/Mkoyr Sarf-- ACP		Y	Attorney/Client   Work Product	Internal email from and to counsel providing and seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation involving the City.
COS_00001751	COS_00001758	3/1/2021	Valla, Aaron			Chen, Michelle			RE: [redacted] - Attorney/Client Privileged		Y	Attorney/Client   Work Product	Memorandum from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests.
COS_00001753	COS_00001768										Y	Work Product	Memorandum from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests.
COS_00001769	COS_00001776	3/1/2021	Valla, Aaron			Chen, Michelle			RE: [redacted] - Attorney/Client Privileged		Y	Attorney/Client   Work Product	Memorandum from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests.
COS_00001777	COS_00001818										Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests.
COS_00001820	COS_00001839	2/9/2021									Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting legal advice and attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_00001840	COS_00001843	5/4/2021	Chen, Michelle			Ramerman, Ramsey					Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests and other litigation involving the City.
COS_00001846	COS_00001847	3/4/2021	Iwun, Stacy			Barnett, Wayne					Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests and other litigation involving the City.
COS_00001848	COS_00001857	3/4/2021	Iwun, Stacy			Barnett, Wayne					Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests.
COS_00001856	COS_00001859	2/23/2021	Chen, Michelle			Iwun, Stacy			RE: Brons PDR #2465 -- For Review - A/C Communication		Y	Attorney/Client	Internal email from counsel providing legal advice and reflecting litigation strategy in anticipation of litigation re: response to public records requests.
COS_00001956	COS_00001958	9/17/2021	Iwun, Stacy			Ferreto, Kimberly			RE: "AC" Hamer Capital		Y	Work Product	Internal email to counsel reflecting legal strategy in anticipation of litigation re: other litigation involving the City.

SP0084

City Privilege Log  
 City Productions 1, 5, 15  
 Iwun, et al v. City of Seattle  
 KCSC No. 21-2-11739-9 SEA

BagBates	EndBates	Document Date	From	Internal Office Property - Author	Internal Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS.00001959	COS.00001980	9/18/2020	Ferreiro, Kimberly			Ferreiro, Kimberly			FV: Mayor's Phone/Text Messages...		Y	Work Product	Internal email in anticipation of litigation re: data or document matters.
COS.00001981	COS.00001981	9/22/2020	Ahlu, Emmanuel			Ferreiro, Kimberly   ArcaCastro, Regi	Iwun, Stacy		Re: Mayor Phone carrier		Y	Work Product	Internal email to and from counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS.00001982	COS.00001983	9/22/2020	Chen, Michelle			Ferreiro, Kimberly			RE: Wednesday's Plan		Y	Work Product	Internal email from counsel providing legal advice in anticipation of litigation re: response to public records requests.
COS.00001984	COS.00001985	10/19/2020	Valla, Aaron			Ferreiro, Kimberly   Iwun, Stacy			RE: A/C Fwd: Question on records		Y	Attorney/Client	Internal email to and from counsel reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS.00001986	COS.00001986	10/6/2020	Chen, Michelle			Lotter, Jim   Ferreiro, Kimberly	Arduhuster, Ghigari   Bashir, Saad		RE: [redacted]		Y	Work Product	Internal email to counsel seeking legal advice re: response to public records requests in anticipation of litigation.
COS.00001970	COS.00001971	11/5/2020	Ferreiro, Kimberly			Chen, Michelle			RE: ***A/C Hukko Text Search Results		Y	Attorney/Client	Internal email to counsel seeking legal advice in anticipation of litigation re: response to public records requests.
COS.00001972	COS.00001972	11/5/2020	Ferreiro, Kimberly			Chen, Michelle			RE: ***A/C Hukko Text Search Results		Y	Attorney/Client	Internal email to counsel seeking legal advice in anticipation of litigation re: response to public records requests.
COS.00001973	COS.00001976	11/18/2020	Ferreiro, Kimberly			Iwun, Stacy			FV: ***A/C Text Search Results		Y	Work Product	Internal email to and from counsel seeking and providing legal advice in anticipation re: response to public records requests.
COS.00001977	COS.00001980	11/18/2020	Ferreiro, Kimberly			Iwun, Stacy			FV: ***A/C Text Search Results		Y	Attorney/Client	Internal email from counsel providing legal advice re: response to public records requests.
COS.00001985	COS.00001985	11/4/2018	Chen, Michelle			Iwun, Stacy			Calendar - PDR		Y	Attorney/Client	Internal email from counsel providing legal advice re: response to public records requests.
COS.00001992	COS.00001992	2/26/2018	Chen, Michelle			Durkin, Jenny	Formas, Stephanie   Prentica, Mark		RE: Monitor		Y	Attorney/Client	Internal email from counsel providing legal advice re: other litigation involving the City.
COS.00001993	COS.00001993	2/26/2018	Chen, Michelle			Durkin, Jenny	Formas, Stephanie   Prentica, Mark		RE: Monitor		Y	Attorney/Client	Internal email from counsel providing legal advice re: other litigation involving the City.
COS.00001994	COS.00001994	12/17/2018	Franklin, Erica R			Iwun, Stacy	Valla, Aaron		FV: C/33631-100918 - attorney - client privileged		Y	Attorney/Client	Internal email from counsel providing legal advice re: response to public records requests.
COS.00001995	COS.00001997	12/22/2020	Ferreiro, Kimberly			Iwun, Stacy			FV: *** A/C ***		Y	Attorney/Client	Internal emails from and to counsel providing and requesting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS.00002028	COS.00002033	9/11/2018	Valla, Aaron			Iwun, Stacy   Chen, Michelle			RE: Kamp PDR Appeal- PDR No. 3574/- A/C Communication		Y	Attorney/Client	Internal email from and to counsel providing and requesting legal advice re: response to public records requests.
COS.00002038	COS.00002039	12/17/2018	Franklin, Erica R			Iwun, Stacy	Valla, Aaron		FV: C/33631-100918 - attorney - client privileged		Y	Attorney/Client	Internal email from counsel providing legal advice re: response to public records requests.
COS.00002040	COS.00002045	12/17/2018									Y	Attorney/Client	Document provided by attorney in order to provide internal email from counsel providing legal advice re: response to public records requests.
COS.00002047	COS.00002047	11/4/2018	Chen, Michelle			Iwun, Stacy			Calendar - PDR		Y	Attorney/Client	Internal email from counsel providing legal advice re: response to public records requests.
COS.00002059	COS.00002060	1/14/2021	Iwun, Stacy			Chen, Michelle			RE: Monitor PDR 59632 - ACP Communication		Y	Attorney/Client	Internal email from counsel providing legal advice re: response to public records requests and reflecting attorney mental impressions and strategy in anticipation of litigation.
COS.00002065	COS.00002065	9/25/2020	Ginger Armbuster   Jim Lotter   Michelle Chen   Kimberly Ferreiro			City Attorney's Office	Saad Bashir				Y	Attorney/Client	Memorandum prepared by and under the direction of counsel providing legal advice, to counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.

SP0085

City, Productions 1, 5, 15  
 Ivin, et al v. City of Seattle  
 KCSC No. 21-2-11739-9 SEA

BagDates	EndDates	Document Date	From	Project - Author	Internal Office Property - Last Author Saved By	To	CC	BCC	Subject	Internal File Name	Redactions?	Privilege Type	Privilege Description
COS_0002066	COS_0002068	12/22/2021	Ferrero, Kimberly		Ivin, Stacy	Ivin, Stacy			Fr: *** AC ***		Y	Attorney/Client	Internal emails from and to counsel providing and requesting legal advice re: response to public records requests.
COS_0002070	COS_0002070	2/9/2021	Ferrero, Kimberly		Ivin, Stacy	Ivin, Stacy			FV: AC PRIVILEGED - mayor text messages		Y	Attorney/Client   Work Product	Internal email from counsel providing legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_0002086	COS_0002087	1/15/2021	Ferrero, Kimberly		Ivin, Stacy   Valla, Aaron				RE: Moritz PDR 59832 - ACP Communication		Y	Attorney/Client	Internal email to counsel requesting legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_0002114	COS_0002117	1/11/2020	Chan, Michelle			Ferrero, Kimberly			RE: ***AC Test Search Results		Y	Attorney/Client   Work Product	Internal emails from and to counsel providing and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_0002121	COS_0002123	9/25/2020	Ginger Ambruster   Jim Loter   Michele Chan   Kimberly Ferrero			City Attorney's Office			Saad Bashir		Y	Attorney/Client   Work Product	Memorandum prepared by and under the direction of counsel providing legal advice, to counsel seeking legal advice and reflecting attorney mental impressions and strategy in anticipation of litigation re: response to public records requests.
COS_0002161	COS_0002163	1/15/2021	Ferrero, Kimberly			Nademan, Jessica			FV: Moritz PDR 59832 - ACP Communication		Y	Attorney/Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.
COS_0002087		1/10/30/2020		Franklin, Etara R	Chan, Michelle				PA-107_293189C5-248D-48A7-7A9F6-993028A918152020-10-30115-04-511.pptx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002153		9/25/2017		Seattle City Attorney	Lawliser				Comprehensive Exemption List.docx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002173		1/22/2017		Nademan, Jessica	Ivin, Stacy				Jessica_PDO Processes.docx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002130		1/4/202019		Lawliser2	Lawliser2				Openers re: responding to Requests for Discovery Investigation.docx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002133		3/1/2017		Erica Franklin	Ivin, Stacy				Exemptions_From Law 2017.xlsx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002131		7/3/2015		Kelly's					PDO Common Exemptions.pdf		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002132		1/11/202016		Perry, Mary	Perry, Mary				DECLINING TO RESPOND TO REQUEST FOR DISCOVERY DEVIATION Sheet.docx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002186		1/10/27/2020		Nademan, Jessica	Ivin, Stacy				PEA and HR Records - Deep Dive		Attorney/Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.	
COS_0002189		1/11/6/2020		Franklin, Etara R	Ivin, Stacy				PDR Training.pptx		Attorney/Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.	
COS_0002187		1/10/30/2020		Franklin, Etara R	Ivin, Stacy				PDO 101.pptx		Attorney/Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.	
COS_0002188		1/10/30/2020		Marjose	Ivin, Stacy				New Employee Orientation - Public Records Act (003).ppt		Attorney/Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.	
COS_0002177		1/7/2019		Nademan, Jessica	Ivin, Stacy				has-qira-training-pia-amendments-and-hr-records.pptx		Attorney/Client	PowerPoint prepared by counsel providing legal advice re: response to public records requests.	
COS_0002129		1/11/5/2015		Administrator	Stacy Ivin				Sample language General.docx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002176		1/4/12/2019							Power Point Presentation.pdf		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002178		1/7/2/2019							Quick Cheat Sheet.pdf		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	
COS_0002023		7/26/2018		Lawliser2	Nademan, Jessica				PPA_101.docx		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.	

SP0086

**Privilege Log**  
 City Productions 1, 5, 15  
 Inm, et al v. City of Seattle  
 KCSC No. 21-2-11739-9 SEA

BagDates	EndDates	Document Date	From	[Meta] Office Property - Author	[Meta] Office Property - Last Author Saved By	To	CC	BCC	Subject	[Meta] File Name	Redactions?	Privilege Type	Privilege Description
COS_00023229		[7/31/2019]		kellys						RPO Common Exemptions.pdf		Attorney/Client	Memorandum prepared by counsel providing legal advice re: response to public records requests.
COS_00023237	COS_00023239	7/19/2019		Ferreiro, Kimberly [Nadelman, Jessica]	Ferreiro, Kimberly					July 18 response to MC meeting-rev.docx		Attorney/Client	Legal advice from counsel; response to public records requests.

## CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2023, I caused a true and correct copy of the foregoing Petitioners' Motion to Stay Discovery to be served in the manner indicated below upon the following individual(s):

James P. Savitt, WSBA  
#16847

Brandi B. Balanda, WSBA  
#48836

Sarah Gohmann Bigelow,  
WSBA #43634

SAVITT BRUCE & WILLEY  
LLP

1425 Fourth Avenue, Suite  
800

Seattle, WA 98101-2272

Telephone: (206) 749-0500

Facsimile: (206) 749-0600

Email: [jsavitt@sbwllp.com](mailto:jsavitt@sbwllp.com)

Email: [bbalanda@sbwllp.com](mailto:bbalanda@sbwllp.com)

Email:

[sgohmannbigelow@sbwllp.co](mailto:sgohmannbigelow@sbwllp.com)

[m](mailto:sgohmannbigelow@sbwllp.com)

*Attorneys for Respondent*

- Legal Messenger
- Facsimile
- Electronic Mail
- USPS First Class Mail
- UPS Shipping
- WA State Appellate  
Courts' Portal

The foregoing statement is made under penalty of perjury under the laws of the State of Washington and is true and correct.

DATED this 18th day of January 2023.

/s/ Lonnie Lopez  
Lonnie Lopez, *Paralegal*  
Law Office of Jeffrey Needle  
705 Second Avenue, Suite 1050  
Seattle, WA 98104  
Telephone: (206) 447-1560  
Facsimile: (206) 447-1523  
Email:  
[lrlopez.paralegal@gmail.com](mailto:lrlopez.paralegal@gmail.com)



# LAW OFFICES OF JEFFREY NEEDLE

January 18, 2023 - 3:18 PM

## Transmittal Information

**Filed with Court:** Court of Appeals Division I  
**Appellate Court Case Number:** 84843-7  
**Appellate Court Case Title:** Stacy Irwin and Kimberly Ferreiro, Petitioners v. City of Seattle, Respondent

### The following documents have been uploaded:

- 848437\_Motion\_20230118151721D1871172\_2265.pdf  
This File Contains:  
Motion 1 - Stay  
*The Original File Name was Motion to Stay Proceedings.pdf*

### A copy of the uploaded files will be sent to:

- bbalanda@sbwllp.com
- christine@sbmlaw.net
- eservice@sbwllp.com
- jsavitt@sbwllp.com
- sgohmannbigelow@sbwllp.com
- susanmm@msn.com

### Comments:

---

Sender Name: Lonnie Lopez - Email: lrlopez.paralegal@gmail.com

**Filing on Behalf of:** Jeffrey Lowell Needle - Email: jneedle@jneedlelaw.com (Alternate Email: )

Address:  
705 Second Avenue, Suite 1050  
Seattle, WA, 98104  
Phone: (206) 447-1560

**Note: The Filing Id is 20230118151721D1871172**

# **EXHIBIT G**

LEA ENNIS  
Court Administrator/Clerk

*The Court of Appeals  
of the  
State of Washington*

DIVISION I  
One Union Square  
600 University Street  
Seattle, WA  
98101-4170  
(206) 464-7750

February 3, 2023

Brandi Buehn Balanda  
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Sarah Gohmann Bigelow  
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Susan B. Mindenbergs  
Law Office of Susan B. Mindenbergs  
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James P. Savitt  
Savitt Bruce & Willey LLP  
1425 4th Ave Ste 800  
Seattle, WA 98101-2272  
jsavitt@sbwllp.com

Case #: 848437

Stacy Irwin and Kimberly Ferreiro, Petitioners v. City of Seattle, Respondent  
King County Superior Court No. 21-2-11739-9

Counsel:

The following notation ruling by Commissioner Masako Kanazawa of the Court was entered on February 3, 2023, regarding Petitioner's Motion to Stay Proceedings:

Plaintiffs Stacy Irwin and Kimberly Ferreiro seek interlocutory review of a revised and updated trial court order entered following in camera review on the City of Seattle's motion for privilege determination. The trial court sustained, overruled, and partially granted the City's attorney-client and work product privilege claims as to specific documents. The Ferreiros also seek review of January 6, 2023 trial court orders that denied their revised motion to compel discovery and for in camera review and compelled plaintiff Kimberly Ferreiro's deposition.

The Ferreiros filed a motion to stay the trial court proceedings until 30 days after the final resolution of their motion for discretionary review. They point out that trial has been rescheduled for June 12, 2023 with discovery cut-off on April 24, 2023. They point out that this Court's earliest available discretionary review calendar at this time is April 7, 2023. They argue a stay is necessary because they seek to discover all unprivileged information in sufficient time to afford them the opportunity to depose City officials

based on the information and use the information at trial. The City filed a response opposing a stay, and the Ferreiros filed a reply.

The Ferreiros request a stay under RAP 8.1(b)(3), which allows this Court to exercise its discretion to stay a trial court decision pending review. But the Ferreiros request a stay of the entire trial court proceedings. Under RAP 8.3, this Court may issue orders, including a stay, “to insure effective and equitable review.” RAP 8.3. Such relief generally requires a showing (1) that the appeal raises a debatable issue and (2) that the harm without relief outweighs the harm that would result from it. In balancing the parties’ relative harm, this Court considers whether the requested relief is necessary to maintain the status quo and preserve the fruits of a successful appeal in light of the equities of the situation. See *Purser v. Rahm*, 104 Wn.2d 159, 177, 702 P.2d 1196 (1985).

The Ferreiros challenge the trial court’s discretionary discovery rulings. Interlocutory review is disfavored, and the Ferreiros’ assertion of debatable issues must be evaluated in light of the strict criteria for discretionary review under RAP 2.3(b) and the deferential standard of review.

Even if Ferreiros raise a debatable issue, a stay is not warranted. As the City points out, if this Court accepts review after considering the motion for discretionary review on the April 7 calendar, the trial court proceedings will likely be stayed with a revised case schedule. Under RAP 7.2(l), when review is accepted from an interlocutory order that does not resolve the entire case, the “trial court retains full authority to act in the portion of the case that is not being reviewed by the appellate court.” The City points out the Ferreiros signed a stipulation agreeing to modify the January 6, 2023 order regarding the timing of the deposition to require Kimberly Ferreiro’s deposition on January 30, 2023, as “a date and time on which the parties have now agreed.” City’s Appendix 650. The Ferreiros fail to show a stay is necessary to preserve the fruits of a successful appeal in light of the equities of the situation.

The motion for stay is denied. However, in considering the motion for discretionary review on the April 7 calendar, the commissioner assigned to the calendar may expedite consideration, and the Ferreiros are not precluded from seeking relief in the trial court.

The City’s request for attorney fees is denied at this time.

Sincerely,



Lea Ennis  
Court Administrator/Clerk

Jh

# **EXHIBIT H**

**From:** [Susan Mindenbergs](#)  
**To:** [Brandi Balanda](#); [Jeffrey Needle](#); [Jeffrey Needle](#)  
**Cc:** [James Savitt](#); [Sarah Gohmann Bigelow](#)  
**Subject:** Re: Irwin et al. v. City of Seattle: Depositions  
**Date:** Monday, February 6, 2023 4:10:03 PM

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Brandi,

We do not object to the City taking the Plaintiffs' depositions for a total of 10.5 hours each with the understanding that these 2 depositions are in lieu of 2-14 hour depositions.

Also, any other deposition taken by the City will be limited to no more than 7 hours.

Please let us know by COB Wednesday (Feb. 8) your availability for the depositions of Chen, Formas, Fong, Durkan, Jones, and a Rule 30(b)(6) witness. Also, let us know for which of these deponents you will be accepting service of process.

Susan B. Mindenbergs  
Attorney at Law  
705 Second Avenue, Suite 1050  
Seattle, WA 98104  
Phone: (206) 447-1560

This communication may contain information that is confidential and/or protected by attorney-client privilege. It was intended only for the named recipient. If you have received this communication in error, please delete it immediately and contact the sender to advise them of improper delivery.

---

**From:** Brandi Balanda <[bbalanda@sbwllp.com](mailto:bbalanda@sbwllp.com)>  
**Sent:** Thursday, February 2, 2023 8:25 PM  
**To:** Susan Mindenbergs <[susanmm@msn.com](mailto:susanmm@msn.com)>; Jeffrey Needle <[jneedle@jneedlelaw.com](mailto:jneedle@jneedlelaw.com)>; Jeffrey Needle <[jneedle@wolfenet.com](mailto:jneedle@wolfenet.com)>  
**Cc:** James Savitt <[jsavitt@sbwllp.com](mailto:jsavitt@sbwllp.com)>; Sarah Gohmann Bigelow <[sgohmannbigelow@sbwllp.com](mailto:sgohmannbigelow@sbwllp.com)>  
**Subject:** Irwin et al. v. City of Seattle: Depositions

Counsel:

Further to our discussion on Monday, we are planning to continue with Ms. Ferreiro's deposition on Thursday, February 9 at 9:30am PT. Ms. Ferreiro and Ms. Irwin are both plaintiffs in this case and they have each asserted individual claims against the City seeking millions of dollars in alleged damages. We believe there is strong support that the City should be entitled to examine Ms. Ferreiro and Ms. Irwin for 2 days each. That said, we would like to see if we can reach an agreement that we may examine Ms. Ferreiro and Ms. Irwin for a day and a half each, rather than having to move the Court for two, two-day depositions. We are willing to limit our exams in this regard to avoid motion practice.

Please let us know if you agree, or would like to discuss.

If not, we will proceed with Ms. Ferreiro on February 9 as our 2-day deposition pursuant to LCR 26(b) (3) under a full reservation of rights, including but not limited to a reservation of rights to seek relief from the Court to order Ms. Irwin to sit for a 2-day deposition.

Thank you,

BRANDI B. BALANDA | SAVITT BRUCE & WILLEY LLP

Joshua Green Building | 1425 Fourth Avenue, Suite 800 | Seattle, WA 98101-2272 | Tel: 206/749-0500 | Fax: 206/749-0600 | [www.sbwllp.com](http://www.sbwllp.com)

***Privileged and Confidential:*** Please be advised that this message may contain information that is private and legally privileged. If you are not the person for whom this message is intended, please delete it and notify me immediately of the error. Please do not copy or send this message to anyone else. Thank you for your cooperation.

CAUTION: This email originated from outside of your organization. Do not click links or open attachments unless you know it is safe.

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# **EXHIBIT I**



**From:** [Sarah Gohmann Bigelow](#)  
**To:** [Susan Mindenbergs](#); [James Savitt](#); [Brandi Balanda](#); [Lonnie Lopez](#)  
**Cc:** [Jeffrey Needle](#); [Christine Tobin \(christine@sbmlaw.net\)](#); [Lonnie Lopez](#); [Meghan Parker](#)  
**Subject:** RE: Discovery issues  
**Date:** Thursday, February 9, 2023 9:12:41 PM

---

Susan,

I write to address your email below.

We understand that you have asked for a 2-week extension for Plaintiffs to provide responses to the City's Third Interrogatories and Requests for Production (we received Plaintiffs' objections yesterday). We agree that Plaintiffs may have a 2-week extension to provide responses to the City's Third Interrogatories and Requests for Production with the understanding that the City likewise may have a 2-week extension to provide responses to Plaintiffs' Second Set of Interrogatories and Requests for Production.

Regarding your statement that you plan to respond to our January 24 letter two weeks from now (on February 22), we need have a call about this forthwith. It's not clear to me whether you are asking for more time to produce the responses and documents Plaintiffs promised during our January 20 discussion, more time to clarify Plaintiffs' position as to certain requests, or something else. Given we have met and conferred about these issues and Plaintiffs ignored our February 3 follow up, we are prepared to move to compel. I note the following in this regard:

- On January 11, I wrote to address outstanding discovery owed by Plaintiffs. Many of these deficiencies had been raised by Ms. Balanda several months ago, in the spring and summer of 2022.
- We met and conferred on January 20, during which you largely agreed to produce the requested materials and to at least clarify Plaintiffs' positions regarding certain of the requests. At the meet and confer, I explained the importance of getting Ms. Ferreiro's outstanding and overdue discovery before her January 30 deposition. You agreed that you would do your best to make this happen with Ms. Irwin's production to follow the week of January 30.
- I summarized our January 20 discussion in my January 24 letter. We did not receive any response to that letter.
- Plaintiffs did not provide any of the promised discovery, and Plaintiffs did not provide any of the promised clarification.
- On February 3, I again wrote to Plaintiffs and explained that if we did not receive the

discovery and clarifications as agreed upon by February 8, the City would proceed accordingly, given the parties had already met and conferred about these issues.

I am available for a call tomorrow any time between 10am – 2pm or between 3pm – 4pm, or on Monday any time between 10am – 2pm or between 3pm – 4pm. Please let me know what time works for you.

SARAH GOHMANN BIGELOW | SAVITT BRUCE & WILLEY LLP  
Joshua Green Building | 1425 Fourth Avenue, Suite 800 | Seattle, WA 98101-2272 | Tel: 206/749-0500 | Fax:  
206/749-0600 | [www.sbwllp.com](http://www.sbwllp.com)

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**From:** Susan Mindenbergs <susanmm@msn.com>  
**Sent:** Wednesday, February 8, 2023 12:59 PM  
**To:** James Savitt <jsavitt@sbwllp.com>; Sarah Gohmann Bigelow <sgohmannbigelow@sbwllp.com>; Brandi Balanda <bbalanda@sbwllp.com>; Lonnie Lopez <llopez.paralegal@gmail.com>  
**Cc:** Jeffrey Needle <jneedle@jneedlelaw.com>; Christine Tobin (christine@sbmlaw.net) <christine@sbmlaw.net>; Lonnie Lopez <llopez.paralegal@gmail.com>; Meghan Parker <mparker@sbwllp.com>  
**Subject:** Discovery issues

Counsel,

We are in the process of finalizing our responses to your 2<sup>nd</sup> discovery set. Let us know if you would agree to a 2-week extension.

We are also responding to Sarah's letter dated January 24. We will respond to that letter on February 22.

Thanks,

Susan B. Mindenbergs  
Attorney at Law  
705 Second Avenue, Suite 1050  
Seattle, WA 98104  
Phone: (206) 447-1560

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