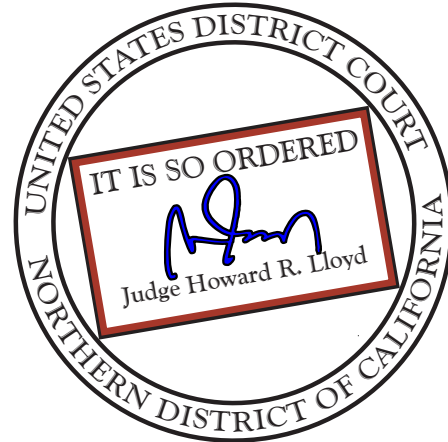


\*E-FILED 3-25-2010\*

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COUNTY OF SANTA CLARA70 West Hedding Street, 9<sup>th</sup> Floor  
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Orry P. Korb  
Lori E. Pegg  
ASSISTANT COUNTY COUNSEL

March 24, 2010

VIA FACIMILE ONLY: 408-535-5410

Magistrate Judge Lloyd  
United States District Court  
280 S. 2<sup>nd</sup> Street, Courtroom 2, 5<sup>th</sup> Floor  
San Jose, California 95113Re: *Laila Batts v. County of Santa Clara, et al.*  
Case No. C0800286 JW (HRL)

Dear Magistrate Lloyd:

I appeared yesterday for oral argument on Plaintiff's motion to compel. A portion of the argument concerned the County's withholding of privileged documents from Nercal Mutual Insurance Company ("NMIC"), which are contained in Defendant Dr. Crandall's personnel file. The Court requested that I identify which documents are in the County's possession and indicate how the County obtained those documents. The Court requested that I provide a response by tomorrow. The Court also requested that I provide a letter brief on the issue of impeachment related to a different discovery dispute by next Tuesday, March 30<sup>th</sup>.

I have begun efforts to respond to the Court's inquiry regarding the NMIC records. In order to fully address the Court's questions, however, I am confident that I will not be able to do so by tomorrow. In order to provide a more thorough response, I am requesting that the Court permit the County to respond to both inquiries by next Tuesday.

Very truly yours,

MIGUEL MÁRQUEZ  
Acting County Counsel

 ARYN PAIGE HARRIS  
Deputy County Counsel

c: Jeremy Friedman, Plaintiff's Counsel (by email only to: jlfried@comcast.net)

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FAX  
TELECOPIER COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGES TO:

NAME: Magistrate Judge Lloyd

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OFFICE: United States District Court

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FAX #: 535-5410 REG. OFFICE #: 535-5365

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FROM

NAME: Aryn P. Harris

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OFFICE: OFFICE OF THE COUNTY COUNSEL OF THE COUNTY OF SANTA CLARA

---

FAX#: (408) 292-7240 REG. OFFICE #: (408) 299-5900

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Comments: Laila Batts v. County of Santa Clara et al. - Case No. C0800286 JW -  
Correspondence dated March 24, 2010

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TOTAL # OF PAGES, INCLUDING THIS COVER SHEET, TRANSMITTED: 02

DATE: Wednesday, March 24, 2010 TIME: 4:05:48 PM

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