

EXHIBIT 3

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*Via Facsimile and U.S. Mail*

Kathleen Darmagnac  
Stubbs & Leone  
2176 N. California Blvd., #900  
Walnut Creek, CA 94596

Re: *Carrasco v. San Ramon Valley Unified School District*, USDC # C04-02395 CRB

Dear Ms. Darmagnac:

I am writing to meet and confer regarding the school district's response to Ms. Carrasco's request for production of documents number nine. Specifically, the school district has asserted numerous objections to plaintiff's request for documents evidencing the district's contracts with Sodexho relating to Shannon, Queirolo and Argallon.

The first objection is vague in that it asserts vague, broad, and ambiguous but does not state more specific grounds for plaintiff to attempt in good faith to clarify the request. The second objection asserts that these documents will not lead to the discovery of admissible evidence. However, any contract between Sodexho and the district relating to these employees is reasonably calculated to lead to the discovery of admissible evidence because of the plaintiff's custodial petition citing an \$80,000 shortfall from Sodexho. The third and fourth objections relate to third party privacy rights and confidentiality provisions. However, my understanding of the law is that a public entity may not enter into confidential agreements.

I look forward to your response in the hopes that we do not need bring a motion to compel.

Very truly yours,



Lizabeth N. de Vries

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