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10 *Attorneys for Defendant, CITY OF LOS ANGELES*

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 LOS ANGELES CATHOLIC
15 WORKER, an unincorporated
16 association; CANGRESS, a non-profit
17 corporation; HARRY JAMES JONES,
18 LOUIS GRADY, LLOYD HINKLE,
19 WALTER SHOAF, individuals

20 Plaintiffs,

21 vs.

22 LOS ANGELES DOWNTOWN
23 INDUSTRIAL DISTRICT BUSINESS
24 IMPROVEMENT DISTRICT,
25 CENTRAL CITY EAST
26 ASSOCIATION, INC., CITY OF LOS
27 ANGELES; DOES 1-10

28 Defendants.

CASE NO.: CV14-7344 PSG (AJWx)

DECLARATION OF LESHON
FRIERSON

1 I LESHON FRIERSON, declare:

2 1. I am a Senior Systems Analyst with the Information Technology
3 Division of the Los Angeles Police Department ("LAPD"). I have held this
4 position for approximately 11 years. I have personal knowledge of the matters
5 stated in this declaration, unless otherwise stated. If called upon to testify as to the
6 truth of these matters, I could and would do so competently.

7 2. Groupwise is the system that the Los Angeles Police Department uses
8 for its email service. Groupwise has been used for as long as I have been a Sr.
9 Systems Analyst.

10 3. Groupwise is on a network, and all emails address to the work email
11 at LAPD go through the Groupwise server.

12 4. I understand that the Los Angeles Police Department has been
13 requested to produce emails going back to 2011 to or from any and all employees
14 of the Los Angeles Police Department containing the terms "homeless," "CCEA"
15 and "BID Officers" in a case entitled *Los Angeles Catholic Worker et al. v. City of*
16 *Los Angeles et al.* CV CV14-7344 PSG (AJWx).

17 5. Such a search would be virtually impossible for several reasons.

18 6. First, with respect to emails sent or received prior to March 2013,
19 LAPD has no archives for those emails. As a result, it is impossible to do keyword
20 searches of emails prior to March 2013. LAPD only has back up tapes prior to
21 March 2013 which are difficult and extremely time consuming to restore. A search
22 of the emails of LAPD employees would have to be conducted box by box –
23 checking each email box for each employee of LAPD. Such a task would entail
24 thousands of hours of time.

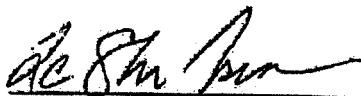
25 7. Second, with respect to emails sent or received after March 2013, a
26 keyword search using the terms in paragraph 4 would be also be impossible for
27 LAPD given the state of its technology and its resources. Such a search would tie
28 up the server for weeks and would require thousands of hours of employee time.

1 Adding additional words to the search would not expedite the search at all. In fact,
2 each additional search word increases the amount of server time needed for the
3 search, substantially.

4 8. Third, the Los Angeles Police Department does not have the resources
5 available to conduct such a search. Our e-mail search capacity is extremely
6 limited. As previously described the three word search described with the terms
7 listed in paragraph 4 above would entail several thousand hours of employee time.

8 9. Finally, I am the only Analyst employed by the Los Angeles Police
9 Department who is trained to conduct email searches of the Groupwise system,
10 with the exception of a colleague who is currently out on maternity leave.

11 I declare under penalty of perjury under the laws of the State of California
12 and the United States that the foregoing is true and correct and was executed on
13 October 28, 2015 at Los Angeles, California.

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17 Declarant, Leshon Frierson
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