



to the requests for production, respond in writing to the questions asked in plaintiffs' March 15, 2016 letter from Myers to Whitaker, serve a complete and detailed privilege log, file and serve a report describing the status of its compliance with this and other court orders, and pay the sanctions awarded by this order, all at least 48 hours prior to the hearing.

The City must bring to the hearing such witnesses as may be necessary to explain what searches for documents have been undertaken, to describe how those searches were conducted, to certify the completeness of the City's production, and to recount the City's efforts to comply with this and previous orders.

The City must continue to cooperate in plaintiffs' efforts to mitigate the prejudice the City has caused to plaintiffs in this case by, among other things, stipulating to requests for reopening previously taken depositions or reasonable modifications of the case schedule.

The alleged lack of personnel to search for or review documents cannot excuse the City's violation of court orders. Therefore, the City must reassign such employees or retain such outside contractors as may be necessary to complete these tasks within the deadline established by this order.

**IT IS SO ORDERED.**

cc: Parties

MINUTES FORM 11  
CIVIL-GEN

Initials of Deputy Clerk\_\_\_\_\_