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18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

20 CARL MITCHELL, et al.,  
21 Plaintiffs,  
22 v.  
23 CITY OF LOS ANGELES, et al.,  
24 Defendants.

CASE NO. CV 16-01750 SJO (JPRx)

**DECLARATION OF CATHERINE  
SWEETSER IN SUPPORT OF  
PLAINTIFFS' APPLICATION TO  
SEAL EX PARTE APPLICATION  
TO STRIKE AND/OR SEAL  
PUBLICLY FILED DOCUMENTS**

Date: None  
Time: None  
Ctrm: 1

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ATTORNEYS FOR PLAINTIFFS

**DECLARATION OF CATHERINE SWEETSER**

I, Catherine Sweetser, declare as follows:

1. I am an attorney at Schonbrun Seplow Harris & Hoffman LLP and one of the attorneys of record in this matter.

2. I have reviewed certain videos filed by the City of Los Angeles and their pleading papers and can testify to the following of my personal knowledge.

3. Two of the videos filed by the City of Los Angeles, and the description of them in the declaration of Lieutenant Mathes, violate the constitutional rights of Plaintiffs by publicly releasing highly confidential and private information about the Plaintiffs.

4. Good cause exists to seal these videos and the description to avoid irreparable harm to the Plaintiffs.

5. I cannot further discuss the contents of the videos without further damaging Plaintiffs' interests, and therefore request to file the accompanying ex parte application to strike and seal those videos under seal to give the court a complete picture of the constitutional privacy rights that have been infringed.

6. I emailed with Defendants' counsel and spoke with them on the phone about this application and the underlying ex parte application in the morning of April 7, 2016.

7. Opposing counsel informed me that Defendants do not oppose our filing the underlying ex parte application under seal, although they do oppose our

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underlying application to seal the videos and remove the language describing them from the declaration.

I declare under penalty of perjury under the laws of the State of California and of the United States of America that the foregoing is true and correct.

Executed on April 7, 2016 at Venice, California.



Catherine Sweetser  
Attorney for Plaintiffs