

Martha Norberg

From: Jacobson, Erin
Sent: Tuesday, November 10, 2015 2:37 PM
To: Pfister, Terri
Cc: Isserlis, Nancy; Farnsworth, Laurie; Coddington, Brian
Subject: RE: Records Legal Review
Attachments: Bob Dunn - Monique Cotton 10-day Notice.pdf; Theresa Sanders - Monique Cotton 10-day Notice.pdf

Importance: High

Terri, here are two sets of documents that are responsive to the Schultz request, and to several of the other requests as well.

The first are letters sent to/from Bob Dunn, in the scope of his representation of Monique. [REDACTED]

The second are text messages between Theresa Sanders and Monique Cotton, captured from Theresa's personal cell phone, as well as handwritten notes taken by Theresa Sanders of conversations with Monique Cotton. [REDACTED]

[REDACTED] these two sets of documents appear to be responsive to the following requests:

- Breen – documents related to transfer and informal complaints
- Schultz – documents related to any complaint, including letters between the attorneys
- Erickson – documents related to transfer and complaints
- Snyder – copy of whatever goes to Breen
- Deshais – documents related to transfer and complaints, plus any other requests re Frank
- Ryals – match Deshais
- Nadrich – match Spokesman

Sorry for the late response, but hopefully you'll still be able to get these third-party notifications out today to make the November 25 deadline that was previously given to Schultz.

I have not had a chance yet to really look at the other batch of texts that Pat wanted me to review before your Friday disclosure deadline, but will do so by Friday and confirm the okay to release at that time. Let me know if anything else comes up or if you have any questions about the attachments. Thanks!

*Confidential & Privileged Legal Materials
[No Disclosure Authorized Without Express Consent of Client(s) & City Attorney]*



Erin A. Jacobson | Assistant City Attorney
office 509.625.6889



From: Pfister, Terri
Sent: Monday, November 09, 2015 5:47 PM
To: Jacobson, Erin
Cc: Isserlis, Nancy; Farnsworth, Laurie
Subject: RE: Records Legal Review

Erin – O [REDACTED]. Can you let us know if this is still the case and can you advise as to [REDACTED]?

We will also need a determination from you as to whether [REDACTED]

Pat may have relayed this to you; I'm not sure. With respect to the text messages, we did provide third-party notification to Straub, as well as Cotton – see first two attachments.



Terri L. Pfister, MMC | City of Spokane | City Clerk
808 W. Spokane Falls Boulevard, Spokane, WA 99201-3342
509.625.6354 | fax 509.625.6217 | tpfister@spokanecity.org

From: Jacobson, Erin
Sent: Monday, November 09, 2015 3:41 PM
To: Pfister, Terri
Cc: Isserlis, Nancy
Subject: Records Legal Review

I discussed the few questions with Nancy.

-- [REDACTED]

--We believe that we should [REDACTED]

--I now have copies of the other texts/notes to review for determination of whether they are responsive. I'll let you know as soon as I've had a chance to conduct that review, which will be by the end of this week.

If I missed anything, just let me know. Thanks!

Confidential & Privileged Legal Materials
(No Disclosure Authorized Without Express Consent of Client(s) or City Attorney)



Erin A. Jacobson | Assistant City Attorney
office 509.625.6889



NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use the information. Also, please indicate to the sender that you have received this email in error, and delete the copy you received. Thank you.