

# THE SILVERSTEIN LAW FIRM

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June 19, 2020

**VIA EMAIL [kcampos@cityofinglewood.org](mailto:kcampos@cityofinglewood.org)  
[mpan@cityofinglewood.org](mailto:mpan@cityofinglewood.org)**

Kenneth R. Campos, City Attorney  
Michael Pan, Sr. Deputy City Attorney  
City of Inglewood  
1 West Manchester Blvd.  
Inglewood, CA 90301

Re: Response to Demand for Deletion of Alleged Privileged Documents  
IBEC Project SCH 2018021056

Dear Mr. Campos and Mr. Pan:

I am in receipt of your June 17, 2020 letter. As a preliminary matter, please keep Naira Soghatyan, Esther Kornfeld and Veronica Lebron of my office copied on all communications, especially as most of us are working remotely. I have copied them in the cover email of this letter.

Regarding the substance of your letter, I personally have not seen or read the document you reference in your June 17, 2020 letter. I understand that Ms. Soghatyan in reviewing documents publicly posted by the City on its website and distributed to the general public as part of an open meeting agenda item saw the subject staff report and attachments.

I have now reviewed the staff report itself (not the subject attachment). As an initial matter, in addition to the fact that the document in question was published to the world by the City for at least several days, and perhaps also made physically available to the public, the staff report shows that the entire document that was uploaded for public access was vetted by multiple City officials and staff, as notated with initials and signatures, including from the City Manager and City Attorney.

However, the purpose of this letter is to acknowledge receipt of your letter and to inform you that although based on my preliminary understanding, the document in

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question does not appear to qualify as privileged on various grounds, nonetheless, we will not disseminate it until we have had an opportunity to review in more detail your letter and the cases you have cited. It is my expectation to be able to more substantively respond to you in the next approximate week.

This is not a concession that the document in question was properly claimed to be privileged or, that there was not a waiver of any potential privilege by virtue of the City's broad public dissemination of the materials. However, we will review the issues further and get back to you regarding same.

Can you provide me with any anticipated dates for the City Council's final hearing and consideration of the IBEC project entitlements and FEIR certification?

As always, please contact me with any questions. Thank you.

Very truly yours,

*/s/ Robert P. Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

cc: Naira Soghatyan, Esq. (Naira@RobertSilversteinLaw.com)  
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