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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

COALITION ON HOMELESSNESS, et al.
Plaintiffs.

v.

CITY AND COUNTY OF SAN FRANCISCO,
et al.,
Defendants.

CASE NO. 4:22-cv-05502-DMR

**JOINT [~~PROPOSED~~ ORDER]
REGARDING EXPEDITED
DISCOVERY**

Hon. Judge Donna M. Ryu

Date Action Filed: September 27, 2022

~~[PROPOSED]~~ ORDER

This matter comes before the Court on Defendants' Administrative Motion for an Extended Briefing Schedule and the Court's request for the parties' to meet and confer regarding any expedited discovery that may be necessary in conjunction with Plaintiffs' Motion for Preliminary Injunction ("PI Motion"). Having carefully considered the motion and the papers submitted, and for good cause shown, it is hereby **ORDERED** as follows:

1. To the extent Defendants rely in part on individual records in the following document categories in opposition to Plaintiffs' Motion for Preliminary Injunction ("PI Motion"), Defendants are hereby ordered to disclose all relevant and related records to Plaintiffs' counsel as follows:

- a. SFPD citation and arrest records, incident reports, complaints, incident tickets, and dispatch logs related to SFPD's enforcement of anti-camping or anti-lodging laws against specific unhoused individuals or specific encampments, for the period six months prior to and six months following any such individual or aggregated records relied on by Defendants in their opposition to the PI Motion. The relevant enforcement records include records related to enforcement of the following ordinances:
 - i. Cal. Penal Code § 647(e) (no lodging without permission);
 - ii. Cal. Penal Code § 148(a) (resisting, delaying, or obstructing an officer);
 - iii. Cal. Penal Code §§ 370, 372 (public nuisance);
 - iv. S.F. Police Code §§ 97(b), 168-169 (anti-camping, "sit/lie" ordinances, prohibition on living in passenger vehicles);
 - v. S.F. Park Code §§ 3.12-3.13 (no lodging or sleeping); and
 - vi. S.F. Port Code §§ 2.9-2.10 (no lodging or sleeping);
- b. Records from HSH databases that detail offers of shelter to specific individuals, including all records related to shelter availability for specific unhoused individuals or specific encampments, for the period six months prior to and six months

1 following any such individual or aggregated records relied on by Defendants in
2 their opposition to the PI Motion; and

- 3 c. Records from the databases of participating HSOC agencies related to past
4 interactions with specific unhoused individuals or specific encampments, for the
5 period six months prior to and six months following any such individual or
6 aggregated records relied on by Defendants in their opposition to the PI Motion;
7 and

- 8 2. Defendants shall produce all such responsive records to Plaintiffs' counsel by **noon on**
9 **November 17, 2022.**

10
11
12 **IT IS SO ORDERED.**

13 Dated: November 7, 2022
14 _____

