



**PACIFIC COAST**  
**INJURY LAW CENTER**

[www.pacificinjurylaw.com](http://www.pacificinjurylaw.com)

4500 E. Pacific Coast Hwy., Ste. 310  
Long Beach, CA 90804

Tel: (213) 457-3974

Fax: (213) 291-1674

1100 Wilshire Blvd., Suite 2812  
Los Angeles, CA 90017

Tel: (213) 457-3974

Fax: (213) 291-1674

6809 Indiana Ave., Suite 143  
Riverside, CA 92506

Tel: (951) 398-3239

Fax: (951) 398-3194

September 19, 2019

Garden Grove City Hall  
11222 Acacia Parkway  
Garden Grove, CA 92840

**Re: Custodian of Records**  
**Anna Nguyen**

Dear Gentleperson:

Pursuant to Government Code § 6253, please provide me with the following records in your possession:

All documents (including documents that are stored or recorded electronically or digitally) with information relating to:

1. Your policies and procedures in effect for the period between May 1, 2015 and May 1, 2019 for inspecting your sidewalks for dangerous conditions, where such conditions include sidewalk slabs broken or protruding so as to constitute a potential tripping hazard;

2. All records of your sidewalk inspections for dangerous conditions, where such conditions include sidewalk slabs broken or protruding so as to constitute a potential tripping hazard, for all such inspections conducted at or near 8971 GARDEN GROVE BLVD., Garden Grove, CA 92844 for the period between May 1, 2015 and May 1, 2019;

3. All records of repair work done on sidewalks 8971 GARDEN GROVE BLVD., Garden Grove, CA 92844 for the period between May 1, 2015 and May 1, 2019;

4. All records of complaints from citizens regarding broken or protruding sidewalk slabs at or near 8971 GARDEN GROVE BLVD., Garden Grove, CA 92844 for the period between May 1, 2015 and May 1, 2019;

5. All records of sidewalk repair work ordered or otherwise pending but, as of May 1, 2015, not yet completed at or near 8971 GARDEN GROVE BLVD., Garden Grove, CA 92844;

6. All Government Code §910 claims for damages submitted to you by those who claimed to have suffered personal injuries as a result of falls or other encounters with broken or protruding sidewalk slabs at



or near 8971 GARDEN GROVE BLVD., Garden Grove, CA 92844 for the period between May 1, 2015 and May 1, 2019.

Government Code § 6253 (c) provides that each agency, upon a request for a copy of records, shall, within 10 days from receipt of the request, determine whether the request, in whole or in part, seeks copies of disclosable public records in the possession of the agency and shall promptly notify the person making the request of the determination and the reasons therefor. In unusual circumstances, the time limit prescribed in this section may be extended by written notice by the head of the agency or his or her designee to the person making the request, setting forth the reasons for the extension and the date on which a determination is expected to be dispatched. No notice shall specify a date that would result in an extension for more than 14 days.

You are advised that court costs and reasonable attorney's fees are compensable in litigation instituted to compel a public agency's duties to provide such documents. This situation includes the voluntary relinquishment of a document by a private party following a plaintiff's suit against a public agency seeking disclosure of that document after the agency's refusal to do so. *Belth v. Garamendi* (1991) 232 Cal. App. 3d 896, 899-903. In *Davis v. City of San Diego* (2003) 106 Cal. App. 4th 893, 903-904, the court of appeal upheld the reasonableness of a \$10,620 attorney's fee award against a city that improperly withheld such documents.

Thank you for your anticipated courtesy and cooperation in this matter and please do not hesitate to contact us at (213) 457-3974 if you have any questions.

Sincerely,

PACIFIC COAST INJURY LAW CENTER

A handwritten signature in blue ink that reads "Jasminder Gill". The signature is written in a cursive style with a large, looping initial 'J'.

\_\_\_\_\_  
Jasminder Gill, Esq.



**PACIFIC COAST  
INJURY LAW CENTER**  
4500 E. Pacific Coast Hwy., Ste. 310  
Long Beach, CA 90804

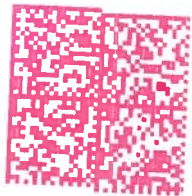
RECEIVED  
CITY OF GARDEN GROVE  
CITY CLERK'S OFFICE

2019 SEP 23 PM 3:31

2019 SEP 23 PM 3:31  
CA 90804  
21 SEP '19  
PM 3:31

Garden Grove City Hall  
11222 Acacia Parkway  
Garden Grove, CA 92840

92840-520822



NEOPOST  
FIRST-CLASS MAIL  
**\$000.50<sup>00</sup>**  
09/20/2019 ZIP 90804  
042L14812987

**US POSTAGE**