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August 25, 2022

VIA PUBLIC RECORDS REQUEST PORTAL

City of Garden Grove
11222 Acacia Pkwy
Garden Grove, California 92840

RE: Southern California Edison Company v. City of Garden Grove

Our File No.: 202012154

Date of Loss: October 16, 2020

Incident Location: An approximate ½ mile stretch of median in the center of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840

To Whom It May Concern:

Please allow this letter to serve as a request for public records. Our office represents Southern California Edison Company in connection with damages to its electric facilities located in the center median at the above-referenced location which were discovered on October 16, 2020. Please allow this letter to also serve as notice that the City of Garden Grove has a duty to preserve all evidence in connection with the incident and our client's property damage, otherwise our client may request sanctions in any resulting lawsuit or proceeding against Caltrans. *Cedars-Sinai Medical Center v. Superior Court* (1998) 18 Cal.4th 1, 9; *New Albertsons, Inc. v. Superior Court* (2008) 168 Cal.App.4th 1403, 1431-1434; see also *Cal. Civ.Pro.* §2023 et seq.

We hereby request the following information:

1. Any and all construction documents pertaining to the above-referenced incident which occurred in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
2. Identify all contractors working for the City of Garden Grove at or near the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20;
3. Any and all project plans pertaining to the above-referenced incident which occurred in the

center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;

4. Any and all construction contracts including but not limited to any and all contracts with R.J. Noble Inc. pertaining to the above-referenced incident which occurred in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
5. Any and all construction guidelines or standards which were in effect on 10/16/20 pertaining to the work being performed at the above-referenced location, i.e. the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840;
6. Any and all daily reports and logs pertaining to the work being performed at the above-referenced location, i.e. the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840;
7. Any and all documents including but not limited to work orders, diaries, logs, and reports of any kind pertaining to any and all work being performed in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20;
8. Any and all incident, emergency, and third party reports pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
9. Any and all audio and video recordings pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
10. Any and all photographs pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
11. Any and all communications, including but not limited to, emails, letters and memoranda pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
12. Any and all investigative reports, including but not limited to ones prepared by your safety personnel or other Departments pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;
13. Any and all witness statements, whether in written form, recorded, or otherwise, of any witnesses alleged to have any information pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.;

14. Any and all maps and/or diagrams pertaining to the work being performed at the above-referenced location, i.e. the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840;
15. Any and all statements by the City of Garden Grove pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.; and
16. Any and all news releases by the City of Garden Grove pertaining to the above-referenced incident which was discovered in the center median of Euclid St. from Lampson Ave. to Chapman Ave., Garden Grove, CA 92840, on 10/16/20 at approximately 11:45 a.m.

Nothing herein shall waive or otherwise limit the rights and remedies of Southern California Edison Company.

Please direct all future communications pertaining to this matter to our office. Your immediate attention and prompt response to this letter would be greatly appreciated.

Sincerely,

Jenus K. Nourafchan

Jenus K. Nourafchan