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*Attorneys for Defendant*  
*CITY OF LOS ANGELES*

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS,  
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal  
entity, et al.,

Defendant.

CASE NO. 2:20-cv-02291 DOC (KES)

Honorable David O. Carter,  
United States District Judge

**DEFENDANT CITY OF LOS  
ANGELES'S REQUEST FOR  
OPPORTUNITY TO RESPOND TO  
NOVEMBER 7, 2025 ORDER TO  
SHOW CAUSE (DKT. 1066)**

Action Filed: March 10, 2020

1 On Friday afternoon, November 7, the Court issued an Order to Show Cause  
2 directing the City to show cause why it should not be held in contempt at an in-person  
3 hearing just two business days later on November 12. Dkt. 1066. The City respectfully  
4 requests an opportunity to respond in writing to that order and to be fully heard on this  
5 matter. The City is particularly concerned to the extent that the Court's order was  
6 prompted by Mr. Garrie's accusations of delays allegedly caused by the City's choice to  
7 exercise its right to counsel. Whatever the basis for the Court's order, the City intends  
8 to respond fully in writing to demonstrate that there is no basis for any contempt  
9 sanctions. If the Court is not inclined to discharge the Order to Show Cause after the  
10 November 12 hearing, the City respectfully requests leave to file a brief of up to 25 pages  
11 by November 19 and to be fully heard on the matter. Out of an abundance of caution  
12 and to correct the record before the hearing, the City addresses below two points raised  
13 in the Special Master's November 7 submission.

- 14 1. **The City's responses to the Special Master's questions were not**  
15 **untimely.** Special Master Martinez sent the City a "Request for Updates  
16 on City of Los Angeles Quarterly Report" on October 30, and requested  
17 that the City provide "written responses by November 6, 2025." Dkt. 1065  
18 at 9. The City did exactly as requested. As Special Master Martinez  
19 acknowledges, the City sent her its written responses on November 6. *Id.*  
20 at 4. Special Master Martinez's complaint that the City's responses  
21 "arrived a full week after [her] inquiry" ignores the fact that the Special  
22 Master herself provided the City a full week to respond. And her assertion  
23 that the City's responses were not "timely" is demonstrably false. The City  
24 is committed to providing accurate information in response to the Special  
25 Master's requests. The process of collecting that information takes time  
26 and effort to coordinate across various departments and persons with  
27 relevant knowledge.  
28

1           2.     **Mr. Garrie has not requested any data from the City.** The Special  
2 Master also contends that Mr. Garrie “has not received the data or access  
3 needed to perform his duties.” Dkt. 1065 at 4. While Mr. Garrie has  
4 submitted questions about the data systems containing the information the  
5 City uses to complete the quarterly reports—including a list of questions a  
6 member of Mr. Garrie’s team sent just 20 minutes before the Court issued  
7 its order to show cause—Mr. Garrie has not yet requested any data from  
8 the City. Without a specific request from Mr. Garrie, the City does not  
9 know what information Mr. Garrie wants or what format to provide it in.  
10 The Special Monitor’s report seemingly suggests that the City must simply  
11 turn over all unspecified “data” in its possession without regard for what  
12 would actually be useful to Mr. Garrie or what he even wants. In reality,  
13 in response to Mr. Garrie’s hundreds of initial questions, the City provided  
14 substantial details regarding the various systems that house data. And the  
15 City coordinated with Mr. Garrie to make Matt Szabo available for two  
16 meetings, which resulted in about an hour of questions and answers about  
17 the relevant data systems. The City has also scheduled further times for  
18 Mr. Garrie to meet again with Mr. Szabo and, in response to Mr. Garrie’s  
19 requests, had also scheduled interviews with other individuals with  
20 knowledge regarding the relevant data systems. The Special Master’s  
21 suggestion that the City is not cooperating with Mr. Garrie’s is meritless.  
22 Notably, neither the Special Master nor Mr. Garrie have identified any  
23 specific person Mr. Garrie has not had access to, any specific questions that  
24 have gone unanswered, or any specific information that the City is not  
25 providing.

1 DATED: November 10, 2025

Respectfully submitted,

2 GIBSON, DUNN & CRUTCHER LLP

3 By: /s/ Theane Evangelis  
4 Theane Evangelis

5 *Attorneys for Defendant*  
6 *CITY OF LOS ANGELES*  
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