

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660  
FAX: (650) 589-5062

[jjaurain@adamsbroadwell.com](mailto:jjaurain@adamsbroadwell.com)

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350  
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201  
FAX: (916) 444-6209

DANIEL L. CARDOZO  
CHRISTINA M. CARO  
DANIKA L. DESAI  
SARA F. DUDLEY  
THOMAS A. ENSLOW  
ANDREW J. GRAF  
TANYA A. GULESSERIAN  
KENDRA D. HARTMANN\*  
KYLE C. JONES  
RACHAEL E. KOSS  
NIRIT LOTAN  
AARON M. MESSING  
WILLIAM C. MUMBY  
CAMILLE G. STOUGH

MARC D. JOSEPH  
*Of Counsel*

\*Admitted in Colorado

December 20, 2019

**Via Email and U.S. Mail**

LaTonda D. Simmons, City Clerk  
City of Oakland  
One Frank H. Ogawa Plaza  
First and Second Floors  
Oakland, CA 94612  
**Email: [lsimmons@oaklandnet.com](mailto:lsimmons@oaklandnet.com)**

William Gilchrist  
Director, Planning & Building  
City of Oakland  
250 Frank H. Ogawa Plaza  
Suite 2114  
Oakland, CA 94612  
**Email: [wgilchrist@oaklandnet.com](mailto:wgilchrist@oaklandnet.com)**

**Via Email Only**

Pete Vollmann, [PVollmann@oaklandca.gov](mailto:PVollmann@oaklandca.gov)

**Re: Public Records Act Request – 88 Grand Avenue Project (PLN18406)**

Dear Ms. Simmons, Mr. Gilchrist and Mr. Vollmann:

We are writing on behalf of **Oakland Residents for Responsible Development** (“Oakland Residents”) to request any and all public records referring or related to the 88 Grand Avenue Project (“Project”) by KTG Y Architecture/88 Grand MC, LLC/Seagate Properties (“Applicant”), ***since the date of our last request on December 6, 2019***, including but not limited to, all documents referenced and/or relied upon in the December 2019 CEQA Analysis.

We are making this request pursuant to the California Public Records Act (“Act”),<sup>1</sup> and request the above documents pursuant to section 6253(a) of the Act. In addition, we request these materials pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of the government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to

<sup>1</sup> Gov. Code, §§ 6250, et seq.  
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provide the greatest access to government information and further requires that any statute that limits the right of access to information be narrowly construed.

If any of the requested documents are available in electronic format, please send them to us using a file transfer program such as Dropbox. If the electronic documents are 10 megabytes (MB) or less (or can be broken into chunks of 10 MB or less), please email them as attachments. We reserve the right to have a copy service make copies of any and all of the requested documents depending on the volume.

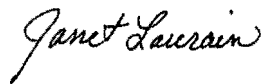
Oakland Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards and environmental impacts of the Project. The association includes: City of Oakland residents; the **International Brotherhood of Electrical Workers Local 595, Plumbers & Steamfitters Local 342, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483** and their members and their families; and other individuals that live and/or work in the City of Oakland and Alameda County.

Please use the following contact information for all correspondence regarding these requests:

Janet Laurain  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Ste. 1000  
South San Francisco, CA 94080  
[jlaurain@adamsbroadwell.com](mailto:jlaurain@adamsbroadwell.com)  
Phone: (650) 589-1660

Thank you for your assistance with this matter.

Sincerely,



Janet Laurain  
Paralegal

JML:ljl

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