



Name, Address and Telephone No. of Attorney(s)
 DANA S. MARTINEZ [SBN 205453]
 MICHAEL E. PLANK [SBN 290943]
 HOLGUIN GARFIELD MARTINEZ & QUINONEZ, APLC
 800 West 6th St., Suite 950, Los Angeles, CA 90017

Attorney(s) for Charging Party, United Teachers Los Angeles

STATE OF CALIFORNIA
 PUBLIC EMPLOYMENT RELATIONS BOARD

United Teachers Los Angeles,

Charging Party,

v.

Los Angeles Unified School District,

Respondent.

Case No. LA-CE-5810-E

SUBPOENA DUCES TECUM

FROM: THE PEOPLE OF THE STATE OF CALIFORNIA

TO: HEWS MEDIA GROUP-COMMUNITY NEWS

You are hereby commanded, business and excuses being set aside, to attend and to testify at the request of
United Teachers Los Angeles, in the above proceeding at PERB
700 N. Central Ave., Suite 200, Glendale, California, on the 7th day of February, 2014
 at the hour of 10 o'clock, a.m. and that you bring with you and there produce the following named documents
 in your custody or under your control, to wit:

See attachment.

You must appear at that time unless you make a special agreement to appear at another time, etc., with
Dana S. Martinez at (213) 623-0170.

(Name of Attorney or Party requesting this Subpoena)

(Telephone Number)

Witness Fees: You are entitled to receive witness fees and mileage in the amount prescribed by law for civil actions
 if you request them BEFORE your scheduled appearance. Request them from the party named above.

Disobedience to this subpoena may be punished as contempt in the manner and form prescribed by law

WITNESS my hand this 29th day of January, 2014.

PUBLIC EMPLOYMENT RELATIONS BOARD

By [Signature]
 (Board Agent)

1 DANA S. MARTINEZ [SBN 205453]
MICHAEL E. PLANK [SBN 290943]
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5 Attorneys for Charging Party,
United Teachers Los Angeles
6

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8 **STATE OF CALIFORNIA**
9 **PUBLIC EMPLOYMENT RELATIONS BOARD**

10 United Teachers Los Angeles,
11 Charging Party,

12 v.

13 Los Angeles Unified School District,
14 Respondent.

) Case No. LA-CE-5810-E

) **DECLARATION OF DANA S.
MARTINEZ IN SUPPORT OF ISSUANCE
OF SUBPOENA DUCES TECUM**

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16
17 I, Dana S. Martinez, declare as follows:

18 1. I am the attorney for the Charging Party, United Teachers Los Angeles, in the above-
19 entitled action. A hearing is scheduled for February 7, 2014, at 10:00 a.m. at the Public
20 Employment Relations Board Los Angeles Regional Offices.

21 2. Hews Media Group-Community News has in its possession or under its control the
22 following matters and things which the Charging Party requires to be produced at that time and
23 place, to-wit:

- 24 a. A true and correct copy of the Public Records Act request sent by Hews
25 Media Group-Community News, Brian Hews, and/or Randy Economy to
26 Respondent, the Los Angeles Unified School District, in 2013, concerning
27 and/or referring to James Roybal, his employment status, and/or his
28 assignment to the Education Service Center-East, and as referred to in the

1 article published by Hews Media Group-Community News in Los Cerritos
2 News on December 18, 2013, entitled "EXCLUSIVE: Public Records
3 Request Reveals Central Basin Water President Roybal Attends LAUSD
4 Teacher Jail" ("December 18 Article"; attached hereto as Exhibit 1).

5 b. True and correct copies of all documents produced by the Los Angeles
6 Unified School District in response to the above-referenced Public Records
7 Act request, including, but not limited to, those documents referred to in the
8 December 18 Article as having been produced on December 12 and/or
9 December 17 of 2013.

10 3. The relevant matter involves whether Respondent has a duty under the Educational
11 Employment Relations Act to produce to the Union Charging Party the names and work assignment
12 locations of bargaining unit members who have been temporarily reassigned due to allegations of
13 misconduct. These unit members are commonly referred to as "Housed Employees."

14 4. The documents subject to this subpoena request are relevant to the Respondent's
15 asserted defense in this action that the identities and work assignment locations of "Housed
16 Employees" (i.e., those employees who, like James Roybal, have been reassigned to locations like
17 the Education Service Center-East after having been accused of misconduct) are confidential and
18 private.

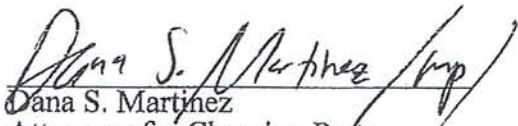
19 5. The subpoenaed documents are relevant to this matter in that they relate to the issue
20 of whether or not Respondent has in fact treated the identities and work assignment locations of
21 "Housed Employees" as confidential and private.

22 I declare under penalty of perjury under the laws of the State of California that, to the best of
23 my knowledge and belief, this DECLARATION is true and correct.

24 DATED: January 28, 2014

HOLGUIN, GARFIELD, MARTINEZ & QUIÑONEZ

25
26 By:


27 Dana S. Martinez
Attorneys for Charging Party
28 UNITED TEACHERS LOS ANGELES