

RESOLUTION NUMBER R- 300734


ADOPTED ON AUG 01 2005

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
SAN DIEGO WAIVING THE ATTORNEY – CLIENT
PRIVILEGE AND ATTORNEY WORK – PRODUCT
DOCTRINE WITH RESPECT TO THE FIRM VINSON &
ELKINS

BE IT RESOLVED, by the Council of the City of San Diego, that, for the purpose of demonstrating cooperation with various investigating authorities and for the purpose of providing such authorities with requested documents relative to their investigations, the attorney – client privilege and attorney work – product doctrine are hereby waived with respect to materials produced, gathered or used by the firm Vinson & Elkins in its investigations concerning City of San Diego disclosures and disclosure practices, such materials to include, but not be limited by, the description attached hereto as Exhibit A.

APPROVED: MICHAEL J. AGUIRRE, City Attorney

By


Leslie J. Girard
Assistant City Attorney

LJG:km
8/10/05
Or.Dept:City Attorney
R-2006-134

PRIVILEGE WAIVER

8/1/05

1. INTERVIEW SUMMARIES FOR V&E INTERVIEWS PREPARED AS PART OF PHASE 2 INVESTIGATION
2. INTERVIEW NOTES FOR ALL INTERVIEWS
3. WRITTEN PROCEDURES USED IN INVESTIGATION INCLUDING KEY WORDS USED IN DOCUMENT SEARCHES AND BRIEF DESCRIPTION OF SEARCH PARAMETERS
4. WRITTEN ANALYSIS
5. WRITTEN CONCLUSIONS – “SUMMARY MEMORANDUM”
6. GENERALLY ALL “WORK-PRODUCT” WHICH MAY INCLUDE PUBLICALLY AVAILABLE DOCUMENTS OR MATERIALS FOR WHICH THE PRIVILEGES WERE PREVIOUSLY WAIVED BUT WHICH HAVE BEEN ASSEMBLED BY V&E AS PART OF ITS WRITTEN MATERIALS

EXHIBIT 1

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