

Judicial Watch vs Office of Mayor

16 CH 462

Report of Proceeding

Taken on: November 08, 2017

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1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF COOK)

3 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
4 COUNTY DEPARTMENT, CHANCERY DIVISION

JUDICIAL WATCH, INC.,)
)
5 Plaintiff,)

6 vs.)

7)
8 THE OFFICE OF THE MAYOR OF THE) No. 2016 CH 000462
CITY OF CHICAGO,)

9 and,)

10 RAHM EMANUEL, in his official)
capacity as Mayor of the City)
11 of Chicago,)

12 Defendant.)

13
14 Report of proceedings had at the hearing in
15 the above-entitled cause before the HONORABLE ANNA HELEN
16 DEMACOPOULOUS, Judge of said Court, commencing at
17 2:11 p.m. on November 8, 2017.

18 APPEARANCES:

19 SVENSON LAW OFFICE, by
20 MS. CHRISTINE SVENSON,
On behalf of the Plaintiff;

21 CITY OF CHICAGO, LEGAL by
22 MS. AMBER RITTER and
MR. PHILLIP SANTELL
23 On behalf of the Defendant.

1 MS. SVENSON: Good afternoon, your Honor.

2 THE COURT: Good afternoon.

3 MS. SVENSON: Hi. Christine Svenson. I'm sorry.

4 THE COURT: Go ahead. Did Ms. Ritter step out?

5 MR. SANTELL: She did, your Honor. She'll be back
6 in just two seconds. If you would just wait --

7 THE COURT: No problem. Go ahead. We're going to
8 the wait. I'm not going to start without her.

9 MS. SVENSON: Sure, of course.

10 MR. SANTELL: Thank you, Judge.

11 (Brief pause.)

12 MS. RITTER: Good afternoon, your Honor. Amber
13 Ritter for the City.

14 THE COURT: Good afternoon.

15 MS. SVENSON: Good afternoon, Christine Svenson on
16 behalf of plaintiff, Judicial Watch, Inc.

17 THE COURT: Come on up, counsel. If you guys will
18 just move over a little bit.

19 MR. SANTELL: Yes, thank you.

20 THE COURT: I just saw your objection to the
21 extension of time so give me one minute --

22 MS. SVENSON: Sure.

23 THE COURT: -- to read it.

24 (Judge viewing document.)

1 THE COURT: All right. So if the parties can
2 identify themselves for the record.

3 MS. RITTER: Amber Ritter for the Mayor's office
4 and City of Chicago.

5 MR. SANTELL: Phillip Santell, S A N T E L L,
6 Assistant Corporation Counsel on behalf of the named
7 defendant.

8 MS. SVENSON: Christine Svenson, S as in Sam, V as
9 in Victor, E N S O N; on behalf of the plaintiff
10 Judicial Watch, Inc.

11 THE COURT: All right. So we're up today on
12 plaintiff's second rule to show cause against the City,
13 the Mayor's office -- It's actually just the Mayor,
14 correct?

15 MS. RITTER: And the Mayor's office.

16 THE COURT: The Mayor's office. And I do have a
17 motion for an extension of time to file the response to
18 the petition for rule to show cause, a reply that was
19 filed today on the response, and then an objection to
20 the rule to the extension of time.

21 MS. SVENSON: Yes. My apologies. It was actually
22 filed on Monday, but I did not get it to chambers until
23 today.

24 THE COURT: Yes.

1 MS. SVENSON: Right.

2 THE COURT: I've received everything as of this
3 moment so let's just start with that proposition. So I
4 guess the first thing that we should be dealing with is
5 the Mayor's response or motion for an extension of time.

6 MS. RITTER: Your Honor, our response to the
7 petition for rule to show cause was -- you know, was set
8 -- the previous schedule was set by your order of
9 September 11th and I am deeply sorry that we did not get
10 the response filed on time. It was my fault and with my
11 caseload being very unpredictable, and I apologize very
12 much. I have attached the proposed, you know, response
13 to the motion for an extension of time. I would just
14 ask to be allowed to file it, you know, now. And I
15 believe counsel in her reply brief did address the
16 arguments of the response. So it seems that the
17 briefing takes into account arguments on the response,
18 not just the motion for the extension of time.

19 THE COURT: Ms. Svenson, go ahead.

20 MS. SVENSON: So if I may.

21 So defendant's request or petition for
22 additional time to me is a microcosmic of how they've
23 handled this entire case. So they -- Their response was
24 due on October 10th. I e-mailed counsel -- This is

1 actually not in my reply. But I e-mailed counsel
2 sometime in mid October asking them if they were
3 intending to file a reply, and they told me they were
4 going to seek an extension. They didn't seek that
5 extension, of course, until November 5th, a couple days
6 ago because, of course, this hearing was coming up. And
7 we don't believe that they have shown good cause.
8 Because typically when good cause is shown, you know,
9 there's an affidavit attached explaining the reasons why
10 the deadline couldn't be met, you know -- with, you
11 know, cases that were up, summary judgment motions, jury
12 trials, whatever it may be. And instead they just
13 attached an affidavit of an IT person, which it is also
14 interesting about that because that IT person evidently
15 didn't begin her search until October 12th, which was
16 two days after their response was due.

17 So in no way have they shown good cause to be
18 able to even be granted, in our opinion, leave to file
19 the response.

20 MS. RITTER: Just on that last point, that's
21 actually not -- The October 12th date of the search is
22 actually not accurate and not what's reflected in the
23 motion. We had the IT person, you know, conduct the
24 search again so that she could print out that piece of

1 paper so that that was attached to our exhibit as an
2 exhibit to show the number of hits that were called from
3 the search. So that's not when she originally did the
4 search, that's just when she printed the sheet that
5 would show, you know, the hits.

6 THE COURT: I guess my biggest concern though,
7 Ms. Ritter, is that your response was due October 12th.
8 So it doesn't strike you like oh, my, it's October 12th.
9 It's October 15th. It's October 24th. Oh, my, it's now
10 November 5th. I better let Judge Demacopoulos know that
11 I've blown her deadline.

12 MS. RITTER: I apologize. I agree with --
13 obviously with the Court that that would be the proper
14 avenue. If the Court isn't willing to give us the
15 extension of time to file the response, I'm happy to
16 just argue, you know, the merits of our response here
17 today having -- with plaintiff having refiled her motion
18 and then her reply. I mean, without, you know, being
19 allowed to file the actual written response, we can talk
20 about the merits of it.

21 Because the -- This motion comes down to the
22 fact that -- that plaintiff since March -- and we've
23 been telling them since March that's it's not possible
24 has been asking us to produce over a hundred thousand

1 e-mails on their very broad search terms. And we've
2 gone back and forth of telling them that this is going
3 to be over a hundred thousand hits and it's all
4 encapsulated in the reply motion that she filed with
5 e-mails back and forth that she attached as exhibits.

6 THE COURT: Ms. Ritter, you know, I'm going to stop
7 you there because I really think that you need to take a
8 deep breath and look at some of the e-mails that you
9 have authored. So let's not get into the substance of
10 the argument quite yet.

11 MS. RITTER: Okay.

12 THE COURT: Let's stick to -- Although I respect
13 your position, Ms. Svenson, I want to get to the
14 substance here. All right. Let's get to the merits.
15 And I'm not happy.

16 MS. RITTER: I know.

17 THE COURT: It's very disrespectful to your
18 opponents. It's disrespectful to the Court. It's
19 disrespectful to the entire judicial process that you
20 think that, you know what, Judge, fine. If you don't
21 want me to file my response in time, you don't want to
22 give me my extension, that's fine. You know what, just
23 let me argue it.

24 The entire purpose of setting the briefing

1 schedule is so that I can be prepared. So that I can be
2 prepared to hear your arguments so that I can make
3 informed decisions and so that we don't fly by the seat.

4 MS. RITTER: I understand that. I didn't mean to
5 sound flippant.

6 THE COURT: Well, you did.

7 MS. RITTER: And I apologize.

8 THE COURT: That's the entire purpose of the
9 briefing schedule is so that we are prepared as well so
10 make the best decisions that we can.

11 So over the plaintiff's objection, I'm going
12 to allow them to file their response so that we can get
13 to the merits so that we can get to what is important in
14 this case. All right. So the response will be filed.

15 Has it been filed with the Clerk's office?

16 MS. RITTER: No. I was asking leave to file it so
17 we can file it, you know, right directly after this with
18 the Clerk's office.

19 THE COURT: It will be filed instanter. So as soon
20 as we're done with the hearing today, down on the 8th
21 floor file it instanter.

22 MS. RITTER: Okay.

23 THE COURT: Have you received a copy of it though?

24 MS. SVENSON: We have.

1 THE COURT: All right. So let's get to the merits
2 here. All right. I just have a couple of questions and
3 I want to make sure that I'm reading the filings
4 correctly. Back in -- Just give me a minute. Sorry.

5 (A brief pause.)

6 THE COURT: September 23rd of 2016, the Court
7 ordered on a motion to dismiss that the parties should
8 get together and determine search terms that should be
9 done on a new search because the Court felt that the
10 searches -- the terms that were originally used were not
11 sufficient to satisfy the FOIA request that was actually
12 sent. And there are certain e-mails that were attached
13 to both the rule to show cause and to the response from
14 both parties. Subsequent to those e-mails, something
15 was turned over in June in court. I don't know what was
16 turned over in June. So can somebody inform me what was
17 turned over in June?

18 MS. RITTER: I can.

19 THE COURT: Okay.

20 MS. RITTER: So in June following correspondence,
21 of course, between us we had up to that point identified
22 with -- worked with plaintiff to identify custodians
23 from the Mayor's office that they wanted us to search
24 their in-boxes. Because originally I think they asked

1 for everyone and that's over to a hundred employees. So
2 we worked with them and got it down to 21 that are
3 people that they thought might be involved with this
4 scenario. So then in June what we produced to them in
5 court was a disk that had all 21 of these people for the
6 time period at issue, which is October 20th, 2014
7 through December 7, 2015, with the search terms Laquan,
8 Van Dyke, which is the shooting officer, of course,
9 spelled both Van Dyke, one word and Van Dyke with a
10 space and that's just in case to catch any, you know,
11 missed -- typos of the name. And L M, which is often
12 what we saw that -- how people refer to the incident.
13 They weren't calling it the Laquan incident. They were
14 calling it the L M incident. So those are the three
15 search terms that we produced. So all 21 of these
16 custodians were searched and those were produced to
17 counsel in June with I think it was six e-mails that
18 were redacted or withheld, which I think your clerk had
19 asked for that and so that's what we prepared and gave
20 to counsel.

21 THE COURT: All right. Is that correct?

22 MS. SVENSON: No. Well, partially. I guess I
23 should clarify. So on that date in court, I was handed
24 a CD. I didn't know what it represented because there

1 was no cover letter attached.

2 THE COURT: Correct.

3 MS. SVENSON: So then we had to follow up with
4 e-mails on numerous occasions to find out whether there
5 were any exemptions, what the CD even represented. So,
6 yes, I did receive the CD back in June, but we didn't
7 know until many months later what it even represented.
8 Probably maybe even two months ago is when I found out.

9 THE COURT: Okay. But the CD still did not have
10 the additional search terms that were ordered in
11 September --

12 MS. RITTER: Correct.

13 THE COURT: -- of 2016.

14 MS. RITTER: But there were no additional specific
15 search terms that were ordered in September of 2016.

16 THE COURT: Correct.

17 MS. SVENSON: But we agreed --

18 THE COURT: Hold on. Hold on, Counsel.

19 MS. SVENSON: I'm sorry.

20 THE COURT: Hold on.

21 So the first response, the first FOIA response
22 the search terms that were used were Laquan, Van Dyke
23 one word, Van space Dyke, and L M, but were limited to a
24 certain amount of custodian searches?

1 MS. RITTER: Right.

2 THE COURT: The second response, the June response,
3 June 2017 response now has 21 custodians, correct?

4 MS. RITTER: Correct.

5 THE COURT: But using those same search terms?

6 MS. RITTER: Correct.

7 THE COURT: So my question is how has the City
8 conformed to this Court's order about additional search
9 terms that I ordered you to agree to with plaintiff?

10 MS. RITTER: So the way that we've conformed to
11 this Court about that is that we have entertained these
12 additional search terms. I mean, of course, your
13 court -- your order provided that we need to come -- you
14 know, come to some agreement or work out some search
15 terms of what it is -- as your Honor has very specific
16 search terms --

17 THE COURT: Slow down, Ms. Ritter, because that
18 record is a mess right now.

19 MS. RITTER: I apologize.

20 THE COURT: So repeat that.

21 MS. RITTER: Okay. Your order -- Your Honor's
22 order didn't suggest any specific search terms to
23 search, but instead suggested that we conferred with
24 plaintiff's counsel and come up with terms that, you

1 know, would be agreeable to -- or and reasonable to be
2 produced. So counsel for plaintiff and plaintiff came
3 up with -- And I can read them for the record, if you're
4 interested.

5 THE COURT: Yes.

6 MS. RITTER: These -- these search terms in
7 addition to the four that I just mentioned, Laquan, Van
8 Dyke, Van Dyke with a space, and L M, that they would
9 like the City to search these 21 custodians and these
10 terms. And these terms are release without an E, so
11 R E L E A S, exclamation point, which as we say in --
12 because there's a boolean search function that our
13 system has. So that would allow for release.

14 THE COURT: So boolean is spelled?

15 MS. RITTER: B O O L E A N. And what that means is
16 when there's a wild card character, in this case
17 R E L E A S exclamation point, that exclamation point is
18 substituted for any letters that could appear in --
19 after that -- the last letter. So in other words, this
20 would encompass the word release because that would be
21 an E would be replacing that exclamation point or
22 released or releasing or releases or from the other
23 words that I'm not thinking about, releasing I think I
24 said that. So the first term they wanted was release,

1 R E L E A S exclamation point and the recording. So
2 what that means is any e-mail that has both the word
3 release with the exclamation point and the word
4 recording anywhere in the e-mail or attachment at any
5 point, those two words are in the e-mail then would be
6 called. That's the first option. The second option is
7 release, R E L E A S exclamation point and video. The
8 third is the same spelling of release and dash. The
9 fourth is same spelling of release and camera. And then
10 we get to recording, the normal spelling and video
11 recording and dash recording and camera. And then dash
12 and camera. And then one word, dash cam.

13 So having -- Yeah, so having taken those
14 search terms and giving them to our IT department, who
15 runs the department at the City that runs searches on
16 e-mails, they informed us that the magnitude of the
17 search is going to be such that it would be difficult to
18 even perform the search because it shuts down their
19 systems for days.

20 THE COURT: Where is that?

21 MS. RITTER: That is the in the affidavit of
22 Melissa Clark (phonetic), attached to our response as
23 Exhibit B and it's at par- -- I can give it to your
24 Honor.

1 THE COURT: Please.

2 MS. RITTER: And it's at -- Let me just look at the
3 paragraph. I'll hand it to you. Paragraph 6 and 7.
4 This is the second page of her affidavit.

5 THE COURT: I don't have it. It's not linked.

6 MS. RITTER: She is as the affidavit explains,
7 Melissa Clark is the person in the City's department of
8 innovation and technology who runs e-mail searches.
9 There's only one person citywide that does this. So she
10 is well-versed in how e-mail searches work. This is all
11 she really does all day long. She input these search
12 terms -- Or I gave her these search terms to search.
13 And as you can see -- and I believe it's paragraph 6,
14 the next page, she says that, Due to -- And I don't have
15 her exact wording of the top of my head. But due to the
16 extent of the large size of the search, she wanted us to
17 identify just a few of the 21 custodians to start with
18 just so she could give us a flavor of how big -- how a
19 magnitude of a search this was going to be. She
20 knows --

21 THE COURT: But what's missing from her affidavit,
22 Ms. Ritter, and what my concern is for purposes of
23 today --

24 MS. RITTER: Mm-hmm.

1 THE COURT: -- which is the rule to show cause is
2 when did you give Ms. Clark this request?

3 MS. RITTER: It would have been back in the spring
4 when we were talking about these search terms or maybe
5 it was early summer.

6 THE COURT: So then is this not reflected in any of
7 your e-mails and/or her affidavit?

8 MS. RITTER: I believe it -- Her affidavit is what
9 she did, not what our interpretation, you know, what's
10 burdensome. But I believe it is --

11 THE COURT: No. No. No. You're missing my
12 question here. Listen carefully.

13 MS. RITTER: Mm-hmm.

14 THE COURT: What's missing from her affidavit is
15 when did you give her this request?

16 MS. RITTER: Well, I think I can answer that
17 question if I look through these e-mails, it would have
18 been referred to. So looking through the e-mails that
19 counsel attached to her reply -- I believe she also
20 attached them to her initial petition -- you see that --
21 Let me just -- Give me a moment, your Honor.

22 THE COURT: Sure.

23 MS. RITTER: I can find them.

24 (Brief pause.)

1 MS. RITTER: Okay. So in the -- On page 3 of 5, it
2 looks like counsel's reply, which is the -- part of the
3 e-mails that she attaches.

4 THE COURT: I'm sorry. Say that again.

5 MS. RITTER: Sure. Page -- it's stamped on the
6 side from the e-filing page 3 of 5, that's the page that
7 I'm looking at from counsel's reply or plaintiff's
8 reply. On that the e-mail from me to Ms. Svenson dated
9 August 22nd, 3:19 p.m. -- And I'm not sure if this is
10 actually an answer of when she first did the search, but
11 we're a big --

12 THE COURT: August 22nd of 2017?

13 MS. RITTER: That's what I'm -- And I -- I believe
14 I told her this earlier and it references that in this
15 e-mail. I said I apologize if that was a
16 (indecipherable), but I think it was.

17 THE COURT: I'm sorry. Say that again.

18 MS. RITTER: I said in the e-mail I apologize if
19 that wasn't communicated to you earlier, that it would
20 yield -- that the search that I just described yields
21 over hundred thousand hits. But I believe it was
22 communicated to her earlier.

23 THE COURT: And so I'm going to ask you again,
24 Ms. Ritter.

1 MS. RITTER: Mm-hmm.

2 THE COURT: Show me where when you requested
3 Ms. Clark --

4 MS. RITTER: I can go back and get that
5 information. It would have been obviously much prior to
6 this August 22nd.

7 THE COURT: Of 2017?

8 MS. RITTER: Yes.

9 THE COURT: My order was in March of 2000 -- I'm
10 sorry -- September of 2016. And if I'm looking at the
11 these e-mail correctly, it appears in March of 2017, you
12 all had agreed on these terms. And the last e-mail --
13 Let me make sure I'm reading it correctly. Friday,
14 March 3rd, 2017, at 12:49 p.m. from you to Ms. Svenson
15 and Michael Akesha (phonetic) that follows an e-mails
16 that's got all of these search terms that they have
17 created. And it's from you that says -- and I'm
18 quoting: It does make sense. I will have them start
19 that now.

20 MS. RITTER: Right.

21 THE COURT: And the first time that there's any
22 memorialization from you to plaintiff that this search
23 is going to yield more than 100,000 e-mails is your
24 e-mail in September of 2017.

1 MS. RITTER: A couple points on that. First of
2 all, that is when -- So in March of 2017, March 3rd, we
3 had that communication which was memorialized in that
4 e-mail and I said I would have -- You know, it does make
5 sense. I will have them start that now, meaning they
6 will run that search.

7 Now, we did phone calls and I recall speaking
8 with plaintiff's counsel who was here and also
9 Mr. Vicasia (phonetic) on the phone where we explained
10 that those search terms are so broad that it's yielding
11 just an unwelding number of hits, over a hundred
12 thousand to be exact.

13 So I don't -- It isn't true that these e-mails
14 reflect the only communications that we had or the only
15 time that we expressed to plaintiff that those very
16 broad search terms, you know, which are now specifically
17 tailored to the Laquan McDonald shooting are going to
18 yield or did yield based on Ms. Clark's search, which
19 was started in March of 2017 --

20 THE COURT: So then there's follow-up e-mails from
21 them. March 29th, Amber, anything on this. No
22 response. Response on March 29th, Hi, Christine, I'm
23 going to be receiving a lot of this tomorrow from my
24 client. It will take a day to put into productable

1 (phonetic) format so I plan to get it to you on Friday.
2 So that's in March of 2017. But yet in June, you give
3 them something that's completely different than what is
4 in the e-mails that you're responding. Because in June
5 what you're giving them is not searches that include
6 those terms. It's searches that include the terms that
7 you originally gave them.

8 MS. RITTER: I believe that they had also asked us
9 to run the terms that we originally searched on all 21
10 of those custodians. It wasn't completely unrelated to
11 what they were asking. It was part of what they asked
12 for.

13 THE COURT: In April, Amber, any updates. No
14 response.

15 MS. RITTER: We produced several thousand e-mails
16 to -- or we reviewed several thousand e-mails to produce
17 them to plaintiff. That does, your Honor, with all
18 respect take a great amount of time.

19 THE COURT: Has anything been produced more than
20 what is on the June CD?

21 MS. SVENSON: No.

22 MS. RITTER: No. Since the time that we produced
23 those e-mails with those search terms that we noted.

24 THE COURT: So have you produced anything other

1 than the June CD?

2 MS. RITTER: Correct. No. Well, except the
3 original production in December of 2015, which was also
4 several thousand e-mails.

5 THE COURT: Go ahead, Ms. Ritter.

6 MS. RITTER: One thing I would submit to the Court
7 is as I mentioned in the e-mails and the dialogue that
8 we had, the search terms the plaintiff -- these second
9 set of search terms with the words like recording and
10 camera, were -- are likely to elicit thousands and
11 thousands if not dozens of tens of thousands of hits
12 that are -- I mean, probably almost all of them are
13 unrelated. I can give you two reasons why I believe
14 that. The first is that, you know, we -- there are lots
15 of other issues that come before the Mayor's office that
16 has to do with cameras and recordings, and specifically
17 red light --

18 THE COURT: I'm not -- I'm sure that that's true.

19 MS. RITTER: But this --

20 THE COURT: But why haven't you filed a formal
21 response by saying that?

22 MS. RITTER: Well, because -- Because I don't know
23 for a fact what's in those e-mails because we haven't
24 started looking at them. The breathe of them is so

1 huge. And they also -- As we've produced all of the
2 e-mails from those 21 custodians that have the words
3 Laquan or Van Dyke or L M in them, by definition these
4 hundred thousand hits or more than a hundred thousand
5 hits are all e-mails that have these search terms that
6 don't even say the word Laquan so they're very unlikely
7 to be connected to that incident. So because of that we
8 have expressed to plaintiff on multiple occasions,
9 including on the phone that these search terms are
10 simply significantly too broad to be constituting what
11 we consider to be a reasonable amount of searching that
12 we need to do to comply with the FOIA request. We have
13 asked them to come up to us with better search terms,
14 more narrow search terms.

15 THE COURT: Where is that? Where is that e-mail?

16 MS. RITTER: I believe it was on the phone.

17 THE COURT: Oh --

18 MS. RITTER: No. I'm sorry. I apologize for
19 getting excited here. But I do think it is in the
20 e-mail and it's --

21 THE COURT: Which e-mail?

22 MS. RITTER: Yes. The e-mail of August 22nd of
23 2017 that I referenced earlier from me to Ms. Svenson
24 and others is three paragraphs long. Actually, the

1 second -- The whole e-mail. I say, In addition to the
2 information that I supplied in yesterday's letter, the
3 search you requested below, which is with what I'm
4 discussing here, still yields over a hundred thousand
5 hits. And then moving on it says, So if you can propose
6 terms that would significantly narrow your request, then
7 we can try again and see how many hits it yields. And
8 then I say, By way of advice, to try to be helpful to
9 get this completed, as I mentioned before -- So we have
10 that conversation about that, terms like recording and
11 camera is not sufficiently specific and is likely to
12 yield thousands of hits of unrelated subjects of
13 voluminous communication such as a red light camera
14 program and lawsuits. So I'm asking them to give me the
15 opportunity to try to give us words -- terms that would
16 get it down to less than, you know, a hundred thousand
17 e-mails.

18 THE COURT: Go head, Ms. Svenson.

19 MS. SVENSON: So plaintiff has been trying to get
20 compliance with this Court's order since September
21 of 2016. The parties conferred via e-mail in March
22 of 2017 and we reached an agreement on the search terms
23 that were to be used. As this is point -- As this Court
24 pointed out, we were to be given records on

1 March 29th -- or I'm sorry -- the day following
2 March 29th, pursuant to an e-mail from counsel. We
3 never received those records. We finally received a CD
4 as we already stated in June of 2017 without a cover
5 letter. We have, of course, then asked questions about
6 what that represented, meaning that CD and -- Because we
7 didn't know that there were exemptions, what part of the
8 search it represented. It was like pulling teeth to get
9 answers.

10 We followed up with them on June 28th,
11 July 10th, July 17th. Defendant did not respond --
12 defendants did not respond to any of those e-mails. We
13 finally said, you know, look in July -- on July 17th in
14 an e-mail, we are force to file another petition for
15 rule if we didn't get compliance, didn't hear anything.
16 The only time we ever heard anything from them is right
17 before a court hearing.

18 With respect to what counsel indicated about
19 the telephone conferences, I recall maybe two at the
20 most in the last two years. And I don't remember
21 exactly the representations that they made. But if
22 there had been, I'm sure they would have been
23 memorialized in e-mail.

24 With respect to, you know, they're claiming

1 the voluminous nature of the hundred thousand plus hits,
2 so we went over this in August with them. We responded
3 and said, okay, via e-mail can you tell us how many
4 hits --

5 THE COURT: Hold on a second. Hold on.

6 (Discussion off the record.)

7 MS. SVENSON: So we notably every time they
8 e-mailed us, we get back to them within a day or two.
9 On August 22nd, she did indicate -- Ms. Ritter indicated
10 that there were over a hundred thousand hits. We got
11 back to them on August 23rd, you know, still asking
12 about the exemptions issue, you know, two months after
13 we got the CD. And then secondly, how many hits does a
14 particular term generate. That could help a lot. Then
15 that's all we have to know. I mean, knowing that
16 there's over 75,000 hits from one custodian isn't that
17 helpful. What's helpful is, you know, which search term
18 generates 30,000 and which generates 5,000. Then you'd
19 be much -- And that's the purpose -- That's why I asked
20 these questions.

21 THE COURT: And I guess for my purposes right now,
22 Ms. Ritter, my concern is when did you ask Ms. Clark to
23 do this?

24 MS. RITTER: That would have been -- And I

1 apologize for not having the exact date when we spoke
2 about this earlier. But based on these e-mail
3 exchanges, it would have been in March of 2017. To run
4 the initial search on both those broad search terms that
5 we discussed and the original search terms we discussed
6 on the 21 custodians.

7 THE COURT: So then what you have attached as
8 Exhibits 1, 2, and 3, are you telling me that Ms. Clark
9 was going to have this document that's going to have a
10 date on it?

11 MS. RITTER: I don't know that -- She'll only have
12 the document with the date on it still if she printed it
13 at the initial time we had her print the screen out so
14 that we can attach it to the affidavit. So I can't
15 relate whether she's still -- You know, if she ever
16 prints it the first time as opposed to just advising us
17 about the number of hits that was yielded. So I'm
18 afraid I don't know the answer to that question.

19 THE COURT: And I guess, Ms. Svenson, I'm going to
20 ask you this question. And if it's a question that you
21 don't feel comfortable asking on behalf of your client,
22 I will respect that.

23 Are you more interested in getting these
24 e-mails or holding the Mayor's office in contempt?

1 MS. SVENSON: I would say both. We need these
2 e-mails. But I also -- I mean, I don't know what else
3 to do.

4 THE COURT: I understand that. And I don't know
5 what else to do either. So here's what I'm going to do.

6 MS. RITTER: I don't mean to interrupt, but I have
7 an idea, if that would be helpful.

8 THE COURT: Ms. Ritter, please. But you know what,
9 if you give me an idea, you better follow through with
10 it.

11 MS. RITTER: Certainly. As we suggested, if we
12 could come up with more narrow search terms, we would
13 produce them. I know it took time --

14 THE COURT: Okay. So, Ms. Ritter, if that was your
15 idea, why didn't you send an e-mail with that?

16 MS. RITTER: I did.

17 THE COURT: No, you -- I don't see a single e-mail
18 that says what your suggested terms are.

19 MS. RITTER: Well, if they would like us to suggest
20 terms, I'm happy to do that. But that wasn't what I
21 understood our communications to be about. And frankly
22 the search terms that we initially suggested were the
23 ones -- the four that your Honor has in front of her --
24 (inaudible).

1 THE COURT: And I already ruled that those are
2 insufficient.

3 MS. RITTER: We have done since the time of your
4 Honor's hearing, a search on -- not on the Mayor's
5 office, but different departments on similar e-mails
6 with additional search terms that I think could be
7 useful here. Those terms are Laquan spelled with an E,
8 because sometimes it's misspelled, we found. The word
9 Burger King because the shooting occurred in front of a
10 Burger King. The word Pulaski because the shooting
11 occurred on Pulaski. So it's possible that someone
12 might have referred to it as the Pulaski shooting.
13 Beyond that my review of tens of thousands of these
14 e-mails from different departments over the course of
15 the past few years shows that they -- anything about
16 this incident does say Laquan or Laquan McDonald on it.
17 These other search terms don't -- you know, haven't
18 been -- We haven't been finding that these search terms
19 are yielding hits that are related to this incident.
20 However, that those search terms would be something I
21 would suggest might be a place to start.

22 MS. SVENSON: If I may --

23 THE COURT: Yes.

24 MS. SVENSON: -- your Honor.

1 So we still -- They agreed on September 8th to
2 actually provide us with how many hits a particular
3 search term generated. That's in her e-mail of
4 September 8th. That's when she says, Yes, I have asked
5 our tech department to pull that together and it will
6 take a few more days. So we never got our answer to
7 that. And that was also not addressed in Ms. Clark's
8 affidavit.

9 THE COURT: All right. So I guess, Ms. Svenson,
10 here's what I -- I'm willing to do.

11 Do you want to stick to those search terms?

12 MS. SVENSON: Yes.

13 THE COURT: And here's the reason why -- I
14 appreciate that the Mayor's office is interested in
15 suggesting those terms. I have no idea what Judicial
16 Watch wants. I don't know if they're interested in just
17 the Laquan McDonald videos or if they're interested in
18 dash-cam videos. I don't know.

19 MS. RITTER: I don't know either.

20 THE COURT: I don't know. And it's their decision
21 to make. It's their FOIA request, okay. So if they're
22 more interested -- It seems that they're more interested
23 in the word release, so it's their search terms.

24 When can you get the information that they

1 have requested in their September e-mail about the
2 number of hits that are yielded on the combination of
3 the terms release exclamation and then the other word?

4 MS. RITTER: Just I -- if, your Honor, you're
5 referring simply to the first search term or all nine of
6 them?

7 THE COURT: Which ones did you want?

8 MS. SVENSON: All of them. Because we agreed to --
9 I think there are nine of them.

10 THE COURT: All nine?

11 MS. SVENSON: Right.

12 MS. RITTER: I can -- I can have Ms. Clark run that
13 immediately on the Court's order. I -- One hitch is
14 that there's apparently two system -- I mean, it's just
15 a technical problem, which it will have to overcome.
16 So, yes, I can get her to do that. Today is Wednesday,
17 I -- Unfortunately Friday is a holiday. So by Monday
18 she can get that hit term.

19 Now let me -- Let me just clarify as to what
20 we're all looking for. Are we looking for a number of
21 hits per custodian, per each of the nine terms? Because
22 that's going to take a lot of time.

23 MS. SVENSON: We could even probably work something
24 out where it would be, you know, half of them or just so

1 we have some idea where to go.

2 THE COURT: Let me ask you this, right. So the
3 number of hits right now, is it limited to the 21
4 custodians?

5 MS. RITTER: In fact, it's limited to the three
6 sample custodians that I -- as Ms. Clark mentions in her
7 affidavit. Because she said this is going to be
8 hundreds of thousands hits and it's going to shut our
9 system down. Unfortunately we don't have a great,
10 modern system. She asked --

11 THE COURT: A great what?

12 MS. RITTER: Modern system.

13 THE COURT: Okay. I just want the record to be
14 clean.

15 MS. RITTER: Certainly. I apologize.

16 She asked me to identify a sampling of
17 custodians so that she could run the search on those
18 samples first. So I --

19 THE COURT: Here's what we're going to do Ms. --
20 We're going to do -- We're going to keep it at the
21 three, three custodians for the nine combination.

22 Does the nine combination also include the
23 four original search terms?

24 MS. RITTER: No.

1 THE COURT: Can it?

2 MS. RITTER: Let me make sure I understand what
3 you're asking. Do you mean can we also add the four
4 original as several more ...

5 THE COURT: Layers.

6 MS. RITTER: I guess I want to make sure I
7 understand what you mean by layers. Do you mean that
8 the terms would have to include those terms and these
9 terms?

10 THE COURT: Yes.

11 MS. RITTER: So let me -- Again, I just want to
12 make sure I'm understanding. When she runs the search
13 for these nine search terms, if we're going to do a hit
14 count as opposed to just a search for e-mails, the way a
15 hit count works is, for example, No. 2, release and
16 video, she'll able to determine, you know, how many
17 e-mails Mr. Collins had for that; how many e-mails
18 Ms. Mitchell had for that; and how many e-mails Ms.
19 (Indecipherable) suggested had for that term. And then
20 if she gets to the second one, release and dash, she'll
21 do the same. Now, the difference between running all
22 these of nine terms together versus doing a hit count,
23 as I'm mentioning is that you're going to get
24 duplicates. So --

1 THE COURT: Sure.

2 MS. RITTER: -- the same e-mail, probably quite a
3 few may have release and video and also release and dash
4 in it, so it will look like there's two separate items.
5 So the hit count is probably going to add up to
6 significantly more than the actual number of e-mails;
7 although I think she can figure that out too.

8 But this is my question for the Court. So
9 then you want -- In other words, No. 10 would be Laquan
10 and then how many hits that -- just that word alone has?

11 THE COURT: No. I'm saying this is an inquiry.

12 MS. RITTER: Okay.

13 THE COURT: Can this be done? Because I think this
14 will limit the number of hits. Can you do release
15 exclamation and video and Laquan?

16 MS. RITTER: Yes. But let me explain, your Honor,
17 that we've already produced all of those e-mails that
18 say Laquan or Van Dyke or L M. So those would be the
19 e-mails we've already produced. If it say -- for
20 this -- You know, this e-mail -- If this was an e-mail,
21 this what I'm holding up and it said release the video
22 about Laquan on it, we've already produced that e-mail
23 because it says Laquan and we've already produced all of
24 the e-mails from these 21 custodians that say Laquan.

1 If it says --

2 THE COURT: And how many were originally produced?

3 MS. RITTER: A few thousands.

4 THE COURT: What does that mean?

5 MS. RITTER: Well, the question is tough because
6 when you have chains of e-mails when we produce it we
7 dedup (phonetic) it, which means that you might get a
8 hit of like 5,000 initially. But by the time -- It's
9 produced actually as a courtesy so that it's not just a
10 bazillion pages; we take out a chain as it just produces
11 the top of the chain. So I think it was --

12 THE COURT: All right. I think I'm getting your
13 point now.

14 So, Ms. Svenson, here's my questions to you.
15 The FOIA request that was sent is limited to
16 October 14th of 2014 through December 7th of 2015, and
17 the language of the FOIA request is, Any and all records
18 of communications sent to and from officials in the
19 Office of the Mayor, comma, including but not limited to
20 Mayor Rahm Emanuel, comma, regarding, comma, concerning
21 or relating to police dash-cam recording of the
22 October 20th, 2014 shooting of Laquan McDonald, comma,
23 including but not limited to the release of any such
24 video recordings to the public.

1 My inquiry is to you, are you interested in
2 any other e-mails that do not relate to the
3 October 20th, 2014 shooting of Laquan McDonald that have
4 the words release, video, dash cam?

5 MS. RITTER: Recording.

6 THE COURT: Recording or any of those nine search
7 terms?

8 MS. SVENSON: I guess I'm confused. Are you saying
9 are we not interested in those?

10 THE COURT: Are you interested in those?

11 MS. SVENSON: Yes.

12 THE COURT: Why? How does that fall into the FOIA
13 request?

14 MS. SVENSON: I'll have you to look at the language
15 again. I'm sorry. I know you just read it to me.

16 THE COURT: Here.

17 MS. SVENSON: Thank you.

18 THE COURT: Do you understand my question? In
19 other words, the nine search terms are going to yield
20 more -- they're going to reveal more communications that
21 are not related to the October 20th, 2014 shooting of
22 Laquan McDonald.

23 And so is the purpose or meaning of the FOIA
24 request limited to the October 20th shooting?

1 MS. SVENSON: And its aftermath, yes, and the
2 dash-cam recording about it.

3 THE COURT: Fine.

4 MS. SVENSON: Right.

5 THE COURT: But if it's limited to that incident,
6 then e-mails that are not related or any -- I'm sorry,
7 it's not just -- Any communication that includes those
8 search terms that is not related to that incident is not
9 responsive to your FOIA request.

10 MS. SVENSON: Related to the incident and its
11 aftermath.

12 THE COURT: Right.

13 MS. SVENSON: Correct.

14 THE COURT: And these search terms are so overbroad
15 that's why you're getting -- They've already produced
16 e-mails that are -- would include the words release,
17 video, dash cam; all of those combinations if they
18 include the word Laquan, Van Dyke, Van, slash -- or
19 space Dyke and L M.

20 MS. SVENSON: But we don't know how many hits each
21 one of these ...

22 THE COURT: I understand that. I appreciate that.

23 MS. SVENSON: Right.

24 THE COURT: And you won't.

1 But if there is, for example, an e-mail
2 concerning the red light camera and release that is now
3 responsive to your FOIA request. Would you agree?

4 MS. SVENSON: I agree.

5 THE COURT: It's going to come up on the search
6 terms for that because it falls into that parameter.
7 And so it's increasing the hits. And so if your FOIA
8 request is targeted or limited to the October 20th
9 shooting of Laquan McDonald, why can't we limit that
10 search term to just Laquan McDonald and those -- Haven't
11 you already received that?

12 MS. SVENSON: I think we have except for we have
13 not searched these terms. And we agreed with them on
14 these terms. I mean, it's just nine more terms.

15 THE COURT: So are you saying there's a possibility
16 that -- Yeah, but you're going to get -- The terms are
17 too -- It's too much.

18 MS. SVENSON: Well, that's what we don't -- I would
19 argue that we don't know. Because if we could just get
20 a number of hits related to each one, we would be in a
21 better position to respond.

22 THE COURT: Can Ms. Clark, based on what you've
23 already tendered cross-reference how many of these are
24 duplicative? Am I answering that -- Did I ask that

1 question appropriately?

2 MS. RITTER: Yeah. I believe I understand. Let me
3 see if I can rephrase that. I know this is confusing,
4 your Honor.

5 You're right in everything you said that, you
6 know, if it says Laquan in it, it's already been
7 produced whether or not it talks about releasing a
8 video. So what I think Ms. Clark can do is, for
9 example, search term No. 2, release exclamation and
10 video, and she can do a search also that includes and
11 not Laquan and not L M and not Van Dyke because those
12 terms have already been -- those e-mails that would have
13 those words in it have already been produced.

14 So then what we have is a hit count of e-mails
15 that have the words release and video in them that don't
16 reference Laquan McDonald or Jason Van Dyke. This is
17 why a few minutes ago I suggested -- And I'm sorry if it
18 wasn't clear as to why sometimes in the -- the search
19 terms it gets a little bit confusing. That if we're
20 going to broaden the search terms, we do it to other
21 references that people might have to Laquan McDonald.
22 Sometimes they spelled his name wrong. In fact, I think
23 even on some of the pleadings in the civil case his
24 named is L E Q U A N instead of L A Q U A N. We since

1 realized that. So that, I think, would be another
2 appropriate search term. We already have all the
3 e-mails that say L A Q U A N. We can add to that the
4 e-mail that say L E Q U A N.

5 Another one as I mentioned is Pulaski because
6 the shooting on was Pulaski. And if people are
7 referring to it, especially in days just after the
8 incident, they might not -- You know, the name of the
9 victim unfortunately wasn't, you know, as known as it is
10 now. They may have referred to it as that shooting on
11 Pulaski. So I'm trying to suggest words that would
12 encompass other ways people would refer to Laquan
13 McDonald or even just McDonald. Although we've run that
14 before on other departments and found that it's almost
15 never responsive. People don't just call it McDonald as
16 opposed to Laquan McDonald. Because as your Honor
17 rightly points out, all you're getting would be these
18 terms. And this is what I've been trying to tell
19 counsel all this --

20 THE COURT: Well, quite frankly, Ms. Ritter, you --
21 the communication hasn't been that great.

22 MS. RITTER: I understand that. But we did have
23 phone calls about this where I said this very thing.

24 THE COURT: The communication has not been that

1 great.

2 MS. RITTER: Okay.

3 THE COURT: Just accept that.

4 MS. RITTER: I do. Thank you.

5 As your Honor stated, all you're getting with
6 running these terms is e-mails that don't reference
7 Laquan McDonald that have these terms, which our
8 argument is it's not responsive to the FOIA request
9 which is why we discourage this search. It's too broad
10 of a search and it needs to be narrowed.

11 THE COURT: It needs to be narrowed.

12 MS. SVENSON: So this is helpful. This is the
13 first time I've heard anything about Pulaski or Laquan
14 spelled the wrong way. So this is really helpful and
15 I'm learning this today. It's November 8th so ...

16 THE COURT: Okay. I think those terms are much
17 more likely to get us more -- better results than some
18 of the other terms. Because there were other issues
19 going on at the same time.

20 MS. SVENSON: Right.

21 THE COURT: All right. I'm going to give the City
22 an opportunity to come up with additional search terms
23 within one week.

24 MS. RITTER: I can do it today, your Honor. I'm

1 happy to confer with counsel directly after this today.
2 What I'd suggest, based on other searches again as I
3 said that we run for City departments since we've made
4 the initial production that have yielded -- I can pull
5 up additional e-mails than just searching for Laquan.

6 MS. SVENSON: Can -- I'm sorry to interrupt.

7 Can we find out how many hits these generate
8 or is that possible?

9 MS. RITTER: I don't know if we can answer that
10 question.

11 THE COURT: Which hit?

12 MS. SVENSON: The nine that -- the search terms
13 that we had, you know, back and forth via e-mail.

14 THE COURT: It's going to be over a hundred
15 thousand.

16 MS. SVENSON: No. Well, I'm talking each
17 individual one though.

18 THE COURT: What difference does it make?

19 MS. SVENSON: Well, because what if one of them
20 only has like 5,000? That's my question. That's my
21 point.

22 THE COURT: She if he can do that.

23 MS. RITTER: I can -- She can definitely do that.

24 THE COURT: Do that as well.

1 Ms. Ritter, you're not quite off the hook yet
2 either.

3 MS. RITTER: I hear you.

4 THE COURT: I want to know when you first requested
5 Ms. Clark to do the search.

6 MS. RITTER: Okay.

7 THE COURT: And I'm not going to be happy if it
8 wasn't shortly after March when you all came to this
9 agreement.

10 MS. RITTER: Yes, it was March.

11 Your Honor, how would you like me to --

12 THE COURT: Anything that she can validate.

13 MS. RITTER: Okay.

14 THE COURT: I mean, it's a computer system. I know
15 that they're time stamped. There's validations.
16 There's all kinds of ways that the City can validate
17 when something was requested. I'm sure that there's
18 some e-mail from you to her. You know, you don't just
19 pick up the phone and say, hey, can you do this,
20 Ms. Clark.

21 MS. RITTER: I'm sure we can find some -- -

22 THE COURT: There's some request form that you used
23 to get her to get her to do this. Because I'm not going
24 to be happy if there was a long delay.

1 All right. So for purposes of today, I'm not
2 going to make a ruling on petitioner's -- on the
3 plaintiff's second rule to show cause. I'm going to ask
4 the parties to again confer and try to come up with some
5 search terms that will yield a workable result.

6 I did receive the index from the June CD, and
7 I guess we'll have to deal with that later if that's
8 going to be something that plaintiff is going to be
9 contesting if those are appropriate exemptions or not;
10 if whether or not I need to do an in-camera inspection
11 and we'll take it from there.

12 MS. SVENSON: Okay.

13 THE COURT: I don't know how much more I can
14 stress. I've reached my limit.

15 MS. RITTER: Your Honor, when would you like us
16 to -- Would you like -- I mean, if we --

17 THE COURT: I'd like you guys to come in a week.
18 Okay. How about next Thursday. Oh, no, that's not
19 good. Wait, let me see.

20 Thursday the 16th or Friday the 17th?

21 MS. SVENSON: So I'm out of town for a conference
22 on Thursday and Friday.

23 THE COURT: How about the following week on the
24 20th or 21st?

1 MS. SVENSON: And then I'm gone for Thanksgiving.

2 THE COURT: That whole week?

3 MS. SVENSON: Well, I leave Monday morning.

4 It's -- Yeah, my parents are out of town. They're
5 elderly so it's hard to --

6 THE COURT: I get it.

7 MS. RITTER: Is next Wednesday not available?

8 THE COURT: I'm good on the 15th.

9 MS. SVENSON: Yeah, I would love if we could do
10 that.

11 THE COURT: The 15th is fine.

12 MS. SVENSON: Oh, that would be great. Thank you.

13 THE COURT: Okay.

14 MS. SVENSON: Thanks, Counsel.

15 What time?

16 THE COURT: 9:30.

17 MS. SVENSON: Okay. Thanks for accommodating.

18 THE COURT: Any questions?

19 MS. RITTER: No. It's clear. Thank you.

20 THE COURT: Okay.

21 MS. SVENSON: Thanks, all.

22 (Which were all the proceedings had
23 in the above-entitled cause.)

24

1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF COOK)

3

4 Terry M. Barfield, being first duly sworn, on
5 oath says that she is a Certified Shorthand Reporter
6 doing business in the City of Chicago, County of Cook
7 and the State of Illinois;

8 That she reported in shorthand the proceedings
9 had at the foregoing hearing;

10 And that the foregoing is a true and correct
11 transcript of her shorthand notes so taken as aforesaid
12 and contains all the proceedings had at the said
13 hearing.

14

15


TERRY M. BARFIELD, CSR

16

17

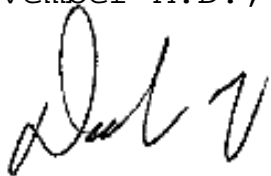
18 CSR No. 084-004536

19

20 SUBSCRIBED AND SWORN TO
21 before me this 14th day
22 of November A.D., 2017.

22

23





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