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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SOLANO

VALLEJO SUN LLC,

 Petitioner,

 v.

CITY OF VALLEJO,

 Respondent.

Case No. CU25-10261

**VALLEJO SUN LLC'S REPLY IN
SUPPORT OF MOTION FOR
JUDGMENT GRANTING PETITION FOR
DECLARATORY RELIEF AND WRIT OF
MANDATE**

Date: April 29, 2026
Time: 10:00 a.m.
Dept: 3
Judge: Hon. Stephen Gizzi

Action filed: November 5, 2025

1 **I. INTRODUCTION**

2 Respondent City of Vallejo’s (“respondent” or “the City”) opposition falls far short of
3 meeting its burden to justify its withholding of records in response to petitioner Vallejo Sun,
4 LLC’s (“petitioner” or “the *Sun*”) request for video recordings of the police shooting of Alexander
5 Schumann under the Public Records Act and AB 748, Gov. Code § 7923.625, which specifically
6 applies to the recordings at issue. The City opposes the *Sun*’s petition on three grounds: it argues
7 that SB 1421’s criminal proceeding delay provision, Pen. Code § 832.7(b)(8)(B), allows it to delay
8 the disclosure of AB 748 recordings and justifies its withholdings in this case; that even absent SB
9 1421’s criminal proceeding delay provision, AB 748 would require it to disclose little more than it
10 already has to the *Sun*; and that it may redact the faces of peace officers who appear in the video
11 recordings at issue based on a second SB 1421 provision that allows agencies to redact records
12 disclosed “pursuant to” SB 1421, Pen. Code § 832.7(b)(6), “to preserve the anonymity of
13 whistleblowers, complainants, victims, and witnesses,” Pen. Code § 832.7(b)(6)(B).

14 The petition should be granted and the City’s arguments in opposition should be rejected
15 for several reasons. *First*, the City does not contest, and thus concedes, important issues. *Second*,
16 contrary to the City, SB 1421’s criminal proceeding delay provision, Pen. Code § 832.7(b)(8)(B),
17 does not apply to and cannot justify the City’s withholding of critical incident recordings that are
18 governed by AB 748, a separate statute that governs here because it specifically applies to the
19 critical incident recordings at issue. *Third*, the City errs by contending that the police shooting
20 “incident” in this case is limited such that few additional disclosures are required – even though,
21 as the City concedes, additional recordings related to the incident, which do depict the incident
22 within the meaning of AB 748, exist and remain in the City’s possession. *Fourth*, the City may not
23 redact critical incident video recordings governed by AB 748 based on SB 1421’s anonymous
24 witnesses redaction provision, Pen. Code § 832.7(b)(6)(B), because, like SB 1421’s criminal
25 proceeding delay provision, SB 1421’s anonymous witnesses redaction provision does not apply
26 to AB 748 records. Finally, *fifth*, on this record, the Court need not conduct an *in camera* review
27 and can instead simply grant the petition and order the disclosure of video recordings consistent
28 with the “incident” timeframe that the *Sun* has proposed. That stated, if the Court wishes to

1 conduct an *in camera* review, the *Sun* has no objection to it doing so. (See *Sacramento Television*,
2 *supra*, 111 Cal.App.5th at p. 1004.) For these reasons and the reasons set forth below, the petition
3 should be granted in its entirety.

4 **II. ARGUMENT**

5 **A. The City Does Not Contest Key Issues.**

6 As a general matter, a litigant’s failure to respond to a point raised in an opening brief can
7 “constitute[] waiver or abandonment of the uncontested issue.” (*Stichting Pensioenfonds ABP v.*
8 *Countrywide Fin. Corp.* (C.D. Cal. 2011) 802 F.Supp.2d 1125, 1132; accord. *People v. Bryant,*
9 *Smith and Wheeler* (2014) 60 Cal.4th 335, 363-64 [“If a party’s briefs do not provide legal
10 argument and citation to authority on each point raised, the court may treat it as waived, and pass
11 it without consideration.”] [internal citations and quotation marks omitted].) Further, in Public
12 Records Act cases, the agency bears the burden of justifying any withholdings, redactions, and
13 claims of exemption, and where the agency has not contested an issue or presented evidence in
14 support of a claim of exemption that has a factual predicate, it has *a fortiori* not met its burden as
15 to that issue or claim. (See *Int’l Fed’ of Prof’l and Tech’l Engineers Local 21 v. Superior Court*
16 *(IFPTE)* (2007) 42 Cal.4th 318, 328-29; Gov. Code § 7922.000; Evid. Code § 500.)

17 The City does not dispute, and thus concedes, that to prevail it bears the burden of
18 demonstrating that its withholdings in response to the *Sun*’s AB 748 request were justified. (MPA
19 ISO Motion for Judgment at 10:13-12:3.) It also does not contest that “[c]onclusory or boilerplate
20 assertions that merely recite statutory standards are not sufficient” to meet this burden. (*Id.* at
21 11:20-12:3.) It does not even address, let alone contest, many of the *Sun*’s statutory interpretation
22 arguments or that Article I, Section 3(b)(2) of the California Constitution should guide the Court’s
23 decision here. (*Id.* at 12:4-19:2.) It does not dispute that its own policies support the *Sun*’s reading
24 of AB 748. (*Id.* at 18:27-19:2.) And, it does not contest that AB 748’s redaction provision does not
25 apply or allow it to make redactions to conceal the identity of peace officers in the critical incident
26 recordings at issue here. (*Id.* at 19:14-20:5.)

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1 **B. California’s Established Statutory Interpretation Framework and the**
2 **Numerous Points of Statutory Interpretation Discussed by the *Sun* – Which**
3 **the City Largely Ignores – Foreclose the City’s Attempt to Use a Provision of**
4 **SB 1421 to Delay Disclosures Required by AB 748.**

5 Whether the City’s denial of the *Sun*’s Public Records Act request in this case (except for
6 partial, redacted video footage that it had previously disclosed at a Town Hall Community
7 Meeting, which the City pointed the *Sun* to only after the *Sun* pressed the City for it) violated AB
8 748 turns primarily on a single legal question: whether the criminal proceeding delay provision in
9 SB 1421, Pen. Code § 832.7(b)(8)(B), allows the City to delay the disclosure of video recordings
10 depicting a critical incident governed by AB 748, Gov. Code § 7923.625(a). To answer that
11 question, the Court must interpret AB 748, which specifically governs access to critical incident
12 recordings.

13 As explained in greater detail in the *Sun*’s moving papers, AB 748 reversed a longstanding
14 policy of secrecy with respect to videos of critical incidents. As our Supreme Court has
15 recognized, “the public’s interest in the conduct of its peace officers is particularly great” with
16 respect to police shootings and uses of force that result in severe injury or death. (*Long Beach*
17 *Police Officers Assn. v. City of Long Beach* (“*Long Beach*”) (2014) 59 Cal.4th 59, 74.) Consistent
18 with this “particularly great” public interest in access, the Legislature enacted AB 748 in 2018.

19 The Court should begin (and, if it concludes that the text is clear and unambiguous, end) its
20 statutory interpretation analysis with AB 748’s text. AB 748 creates distinct, heightened
21 “minimum standards” for access to, Gov. Code § 7923.625(c), and “specific guidelines to govern
22 the disclosure” of, *Sacramento Television, supra*, 111 Cal.App.5th at p. 997 [internal citation and
23 quotation marks omitted], recordings of two categories of “critical incidents” involving the most
24 serious uses of force by police officers, Gov. Code § 7923.625(e). It provides that these recordings
25 must be disclosed particularly quickly and completely, subject “*only*,” Gov. Code § 7923.625
26 [emphasis added], to the delay and redaction exceptions in AB 748 itself. (Accord. Gov. Code §
27 7923.625(c) [stating that AB 748 set “minimum standards” for access to recordings of critical
28 incidents]; Gov. Code § 7923.625(f) [providing that AB 748 “does not alter, limit, or negate
rights, remedies, or obligations with respect to public records *regarding an incident other than a*
critical incident as described in subdivision (e)”] [emphasis added].) The word “only” in AB

1 748’s prefatory language is restrictive when given its ordinary meaning and as interpreted by
2 California courts. (See *Mustaqeem v. City of San Diego* (Cal.Ct.App. Jan. 22, 2026), No.
3 D085750, 2026 Cal. App. LEXIS 32, at *19.) AB 748’s use of the word only, its statement in
4 subdivision (c) that it sets “minimum standards” for access to critical incident recordings, and its
5 use of language in subdivision (f) that safeguard the ability of AB 748 to “alter, limit, or negate
6 rights, remedies, or obligations” “regarding a critical incident described in subdivision (e) make
7 clear that critical incident recordings governed by AB 748 must be disclosed when and to the
8 extent that Ab 748 requires, unless an exception *in AB 748* applies.

9 Because the plain language of AB 748 is clear, the Court could end its statutory
10 interpretation analysis here. But, as explained in the *Sun*’s opening brief, MPA ISO Motion for
11 Judgment at 12:4-19:2, a chorus of other statutory interpretation considerations confirm that this
12 reading of AB 748 is correct. AB 748’s legislative history, multiple rules regarding and canons of
13 statutory construction, and Article I, section 3(b)(2) of the California Constitution, as well as the
14 City’s own policies, all confirm that SB 1421’s criminal proceeding delay provision cannot justify
15 delaying disclosure under AB 748.

16 The City spends little time discussing the *Sun*’s statutory interpretation analysis, and when
17 it does, it mischaracterizes the *Sun*’s position. The City states that the *Sun*’s position is that SB
18 1421’s criminal proceeding delay provision does not apply to AB 748 critical incident recordings
19 because SB 1421 and AB 748 “are different statutes.” (Opp. at 9:19.) That mischaracterization
20 ignores the detailed, multi-step analysis in the *Sun*’s memorandum in support of this motion,
21 which discussed the language and history of AB 748, numerous rules of statutory construction,
22 Article I, section 3(b)(2) of the California Constitution, relevant case law, and the City’s own
23 critical incident policies. (See MPA ISO Motion for Judgment at 12:4-19:2.) The entirety of that
24 analysis, not only the fact that AB 748 and SB 1421 “are different statutes,” supports the *Sun*’s
25 interpretation of AB 748 and should guide the Court’s ruling on the issue.

26 The City’s statutory interpretation analysis, which contends that SB 1421’s criminal
27 proceeding delay provision allowed it to delay disclosure in response to the *Sun*’s AB 748-based
28 Public Records Act request, on the other hand, misses the mark and should not be adopted by the

1 Court. The City errantly focuses on legislative history, and in doing so skips the indispensable first
2 step of the statutory interpretation analysis: consideration of the statute’s plan language, which is
3 generally dispositive when it is clear. (See, e.g., *In re Greg F.* (2012) 55 Cal.4th 393, 408 [where a
4 statute’s meaning is “clear” under “standard principles of interpretation ... there is no need to
5 resort to legislative history”]; *Great Lakes Props., Inc. v. El Segundo* (1977) 19 Cal.3d 152, 155
6 [“It is axiomatic that in the interpretation of a statute where the language is clear, its plain meaning
7 should be followed.”]; *Day v. City of Fontana* (2001) 25 Cal.4th 268, 272 [“If there is no
8 ambiguity, then we presume the lawmakers meant what they said, and the plain meaning of the
9 language governs.”]; *Lungren v. Deukmejian* (1988) 45 Cal.3d 727, 735 [“If the language is clear
10 and unambiguous there is no need for construction, nor is it necessary to resort to indicia of the
11 intent of the Legislature (in the case of a statute) or of the voters (in the case of a provision
12 adopted by the voters).”]; *Hamilton & High, LLC v. City of Palo Alto* (2023) 89 Cal.App.5th 528,
13 549 [where statute is clear, it is “unnecessary to resort to extrinsic interpretive aids such as the
14 legislative history”].) Furthermore, the City fails to even mention, let alone persuasively rebut, the
15 *Sun*’s analysis of numerous other rules of statutory construction and indicia of meaning, including
16 the rule that more specific statutes generally take precedence over more general ones when two
17 inconsistent statutes potentially apply, *Salazar v. Eastin* (1995) 9 Cal.4th 836, 857, the helpful
18 *expressio unius est exclusio alterius* canon of construction which holds that “if exemptions are
19 specified in a statute,” as they are in AB 748, courts “may not imply additional exemptions unless
20 there is a clear legislative intent to the contrary,” *Rojas v. Superior Court* (2004) 33 Cal.4th 407,
21 424, and the interpretive mandate in Article I, section 3(b)(2) of the California Constitution, which
22 confirms that any ambiguity here should be resolved in favor of access. (MPA ISO Motion for
23 Judgment at 12:4-19:2.)

24 Even if the City’s rush to consider AB 748’s legislative history were a permissible
25 approach to statutory interpretation (and it is not), the legislative history it cites supports
26 the *Sun*’s interpretation of AB 748, not the City’s. (See Opp. at 4:19-6:2.) The City states,
27 when discussing its supplemental legislative history, that the California Police Chief
28 Association made a statement in opposition to the bill “raising concerns about the

1 protection of “ongoing investigations or active prosecutions.” (Opp. at 5:11.) The City
2 then recounts that the Assembly Committee on Privacy and Consumer Protection
3 responded not by including new language addressing the “active prosecutions” concern,
4 but instead by stating in its August 29, 2018 analysis that “the [then-]current version of
5 the bill” already “appear[ed] to reasonably protect” investigations “by giving police the
6 ability to withhold footage of critical incidents for up to 45 days if the agency determines
7 that disclosure would substantially interfere with an active investigation.” (*Id.* at 5:16-
8 18.) Contrary to the City, this exchange indicates that the Legislature intentionally
9 included an active investigation delay provision in but omitted a criminal proceeding
10 delay provision from AB 748 for policy reasons, not because it believed that the criminal
11 proceeding delay provision in SB 1421 might apply. “A court may not rewrite a statute,
12 either by inserting or omitting language, to make it conform to a presumed intent that is
13 not expressed.” (*Cornette v. Dept. of Transportation* (2001) 26 Cal.4th 63, 73–74; see
14 also *Dept. of Corrections & Rehabilitation v. Workers’ Comp. Appeals Bd.* (2018) 27
15 Cal.App.5th 607, 618, fn. 8 [“We decline to read words into a statute that do not exist in
16 its text.”]; Code Civ. Proc., § 1858 [in “construction of a statute,” court may not “insert
17 what has been omitted” or “omit what has been inserted”]). The City’s abstract discussion
18 of what it believes the law should say as a matter of policy, untethered to legal authority,
19 is also unavailing. (*State of Cal. ex rel. Hindin v. Hewlett-Packard Co.* (2007) 153
20 Cal.App.4th 307, 320 [“arguments as to what [the City] believes the Legislature should
21 have enacted” cannot “change the plain language of the statute the Legislature did enact,
22 or rewrite the legislative history evincing what the Legislature intended.”].)

23 In a technical sense, it is true that *Sacramento Television, supra*, 111 Cal.App.5th at p.
24 1000, did not specifically address whether SB 1421’s criminal proceeding delay provision could
25 justify delaying the disclosure of critical incident recordings governed by AB 748. However, as a
26 practical matter, the City’s reading of AB 748 would, if adopted, effectively abrogate the holding
27 in *Sacramento Television, supra*, 111 Cal.App.5th at p. 1000, that a declaration attesting to “a
28 pending criminal prosecution, by itself and without more information,” is insufficient to justify

1 delaying the disclosure of AB 748 records based on harm to an “ ‘active pending investigation’ ”
2 under Government Code section 7923.525(a). If SB 1421’s criminal proceeding delay provision
3 applied to AB 748 recordings, as the City contends, agencies could secure the same kind of delay
4 rejected in *Sacramento Television* using the same kind of declaration that failed there.

5 The City’s reliance on *Becerra v. Superior Court* (2020) 44 Cal.App.5th 897, 924-25 is
6 also misplaced, because the question presented in *Becerra* turned on the statutes and language at
7 issue there, and the statutes and language here are materially different. In *Becerra*, the Court of
8 Appeal held that SB 1421’s prefatory “notwithstanding any other law” language did not
9 categorically displace the catch-all exemption, based largely on how our Supreme Court had
10 previously interpreted that “particular phrase.” (*Id.* at p. 925.) It explained,

11 That particular phrase been deemed a “ ‘ ‘ ‘term of art’ ’ . . . that declares the
12 legislative intent to override all *contrary* law.’ ” (*Arias v. Superior Court* (2009) 46
13 Cal.4th 969, 983 [. . .].) Thus, “only those provisions of law that conflict with”
section 832.7(b)—“not . . . every provision of law”—are inapplicable. (*Arias*, at p.
983.)

14 (*Becerra, supra*, 44 Cal.App.5th at p. 925.) The *Becerra* court considered the rest of the
15 statute and held that it, too, reflected “the Legislature’s intent to preserve, not override,
16 the [Public Records Act] but for its investigatory files exemption,” except, again, for
17 “those provisions of law that conflict with section 832.7(b).” (*Id.* at pp. 924-25.) After
18 further examining SB 1421, it then held that the catch-all exemption did not conflict with
19 SB 1421 in all cases and could, in at least some circumstances, allow agencies to
20 withhold (if not redact) SB 1421 records based on a claim of undue burden. (*Id.* at p.
21 929.)

22 The statutes and language at issue here are materially different. Unlike the
23 “notwithstanding any other law” language in SB 1421 that *Arias, supra*, 46 Cal.4th at p.
24 983 held only displaces other “contrary” laws, AB 748 begins with “only,” which has a
25 clearer and more restrictive meaning and *does* indicate that other exemptions and delay
26 provisions have been categorically displaced and do not apply. (See *Mustaqeem, supra*,
27 2026 Cal. App. LEXIS 32, at *19 [holding that the Legislature’s use of the term “only” in
28 Government Code § 51039(a)(1) made the exclusivity of the list in that subdivision

1 “unambiguous”]; see also *id.*, at *20 [stating that “the Legislature was quite clear that
2 violations of a local authority’s sidewalk vending regulations are punishable *only* by the
3 enumerated monetary fines or the rescission of the vendor’s permit” under Gov. Code §
4 51039(a).] AB 748 contains additional language that confirms this, which SB 1421 does
5 not. (See Gov. Code § 7923.625(c) [AB 748 sets “minimum standards” for access to
6 critical incident recordings]; Gov. Code § 7923.625(f) [AB 748 does not displace other
7 Public Records Act provisions except with respect to critical incident recordings].)
8 Further, unlike SB 1421 and the catch-all exemption, AB 748 and SB 1421 overlap and
9 conflict regarding the timing of disclosure and permissible justifications for delay. The
10 remainder of the statutory interpretation discussion in the *Sun*’s moving papers further
11 confirms that *Becerra* is not controlling here. (See MPA ISO Motion for Judgment at
12 12:4-19:2.)

13 **C. The City Should be Ordered to Disclose Video Recorded From the Time that**
14 **Officers Were Dispatched to Respond to 911 Calls About Mr. Schumann Until**
the Time that Mr. Schumann was Removed from the Area.

15 The scope of the incident at issue here, and thus the extent to which the City must disclose
16 recordings under AB 748, must be delineated such that the public can “fully, completely, and
17 accurately comprehend” what took place. (*Sacramento Television, supra*, 111 Cal.App.5th at pp.
18 1003-04.) Here, especially given questions that remain unanswered about who was told what,
19 when about 911 calls reporting Mr. Schumann’s actions, see Morris Decl. ¶¶ 8-10, and the City’s
20 own earlier decision to disclose 911 call and dispatcher recordings and other video and audio
21 recordings covering a time period beginning before and ending at the close of the incident at its
22 Town Hall Community Meeting about the shooting, see Opp. at 7:16-20 [characterizing
23 disclosures at the Meeting as including “*video and audio depicting the incident*,” consistent with
24 the language of AB 748], the City should be ordered to disclose video recordings captured from
25 the time that officers were dispatched to respond to 911 calls about Mr. Schumann through the
26 time Mr. Schumann was removed from the area. While the City contends in a conclusory
27 declaration by its counsel that the Town Hall Community Meeting presentation included “all video
28 footage depicting the shooting incident,” it does not define the phrase “depicting the incident” and

1 a news article by investigative news organization *Open Vallejo*¹ indicates otherwise.

2 **D. The City Has Not Shown, and Cannot Show, that SB 1421’s Anonymous**
3 **Witness Redaction Provision Applies or Allows Any Redactions Here.**

4 Like SB 1421’s criminal proceeding delay provision, SB 1421’s redaction provisions,
5 including its anonymous witness redaction provision, Pen. Code § 832.7(b)(6)(B), do not apply to
6 critical incident recordings governed by AB 748. (See MPA ISO Motion for Judgment at 12:4-
7 19:2.) AB 748 sets “minimum standards” for access to critical incident recordings and allows
8 nondisclosure or redaction “only” if an exemption in AB 748 itself applies. (See *ibid.*) AB 748 and
9 SB 1421 contain different, conflicting sets of redaction provisions, suggesting that the
10 Legislature’s omission of any anonymous witness redaction provision from AB 748 was
11 intentional and should be given effect by this Court. (See *Rojas, supra*, 33 Cal.4th at p. 424.) Also,
12 SB 1421’s anonymous witness redaction provision, Pen. Code § 832.7(b)(6)(B), only applies to
13 records disclosed “pursuant to SB 1421,” which the AB 748 recordings requested by the *Sun* are
14 not.

15 The City has not even clearly stated, let alone met its burden to prove with non-conclusory,
16 particularized evidence, see MPA ISO Motion for Judgment at 11:20-12:3 [discussing City’s
17 burden of proof], that SB 1421’s anonymous witnesses redaction provision, Pen. Code §
18 832.7(b)(6)(B), applies here even accepting *arguendo* that the provision allows the City to redact
19 AB 748 records where the factual predicates for applying it are present (it does not). SB 1421’s
20 anonymous witness redaction provision explicitly allows the City to redact records only where and
21 to the extent that redaction would “preserve” the “anonymity” of, *inter alia*, “witnesses.” Here,
22 any peace officers depicted in the AB 748 videos requested by the *Sun* here would presumably
23 have been recorded in public spaces while on the job, so they were never “anonymous” and have
24 no “anonymity” to preserve in the first instance. Further, even if potentially applicable (and it is
25 not), SB 1421’s anonymous witness redaction provision would not allow the City to redact the
26 identities of the officers involved in the shooting incident, who are not “witnesses” within the

27 ¹ (Geoffrey King, *Vallejo police shot a man amid a mental health crisis. Here is the footage the*
28 *DA refuses to release.* (Open Vallejo Nov. 6, 2025), [https://openvallejo.org/2025/11/06/vallejo-police-shot-a-man-amid-a-mental-health-crisis-here-is-the-footage-the-da-refuses-to-release/.](https://openvallejo.org/2025/11/06/vallejo-police-shot-a-man-amid-a-mental-health-crisis-here-is-the-footage-the-da-refuses-to-release/))

1 meaning of the statute. (See *BondGraham v. Superior Court* (2023) 95 Cal.App.5th 1006, 1012
2 [agreeing “that police officers who witness misconduct may not have their names redacted under
3 section 832.7, subdivision (b)(6)(B)”].) The City’s request to redact responsive records should be
4 denied.

5 **E. The Court May Grant the Petition Without an *in Camera* Review on This**
6 **Record, but the *Sun* Would Not Object to an *in Camera* Review if the Court**
7 **Concludes an *in Camera* Review is Appropriate.**

8 The Court need not conduct an *in camera* review on this record, and may instead simply
9 grant the petition consistent with the definition of “incident” proposed by the *Sun*. “[A] trial
10 court’s prerogative to inspect documents *in camera* is not a substitute for the government’s burden
11 of proof, and should not be resorted to lightly.” (*ACLU of N. Cal. v. Superior Court* (2011) 202
12 Cal.App.4th 55, 87 [internal quotation marks omitted].) Nor is it “a substitute for the
13 government’s obligation to justify its withholding in publicly available documents.” (*Ibid.*) And,
14 here, the City has not made the public showing generally required to obtain an *in camera* review
15 as a matter of right. (See *Torres v. Superior Court* (2000) 80 Cal.App.4th 867, 873 [to obtain an *in*
16 *camera* review, a party asserting the official information privilege “must either show in open court
17 why the matter is privileged, or declare that doing so would compromise the privilege”].) That
18 stated, if the Court wishes to conduct an *in camera* review of potentially responsive video
19 recordings here, the *Sun* would not object. (See *Sacramento Television, supra*, 111 Cal.App.5th at
20 p. 1004.)

21 **III. CONCLUSION**

22 The *Sun*’s petition should be granted in its entirety. The City should be ordered to disclose
23 all responsive video recordings immediately. The City should also be ordered not to redact police
24 officers’ faces or identities in these recordings because it has not shown, and cannot show, any
25 redaction of officers’ faces is justified. Finally, the Court should find and declare that the City’s
26 denial of the *Sun*’s request based on the criminal proceeding delay provision in SB 1421 was
27 unlawful.
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Dated: February 20, 2026

FIRST AMENDMENT COALITION

By



DAVID LOY
AARON R. FIELD
Attorneys for Petitioner FIRST
AMENDMENT COALITION

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PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Marin, State of California. My business address is 534 4th Street, Suite B, San Rafael, CA 94901-3334.

On February 20, 2026, I served true copies of the following document(s) described as **VALLEJO SUN LLC’S REPLY IN SUPPORT OF MOTION FOR JUDGMENT GRANTING PETITION FOR DECLARATORY RELIEF AND WRIT OF MANDATE** on the interested parties in this action as follows:

Katelyn M. Knight, Assistant City Attorney
Kristoffer S. Jacob, Assistant City Attorney
Sukhnandan Nijjar, Deputy City Attorney
CITY OF VALLEJO, City Hall
555 Santa Clara Street, 3rd Floor
Vallejo, CA 94590
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BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address rregnier@firstamendmentcoalition.org to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 20, 2026, at East Palo Alto, California.



Robin P. Regnier