

From: [Sharifi, Ghazal](#)
To: [Corey Guilmette](#)
Cc: [Anderson, Matthew](#); [Anne Roberson](#); [Boatright, Rebecca](#); [Sylve, Dee](#); [Elodie Daquila](#); [emoore@ehmpc.com](#); [Litfin, Jennifer M](#); [Karenk@stritmatter.com](#); [kcobb@freybuck.com](#); [Nakata, Kelly](#); [Lisa Benedetti](#); [Lisa Smith](#); [Matthew Kniffen](#); [Melanie@stritmatter.com](#); [prachi.dave@defender.org](#); [Ted Buck](#); [Wolf, Jeff M](#); [Sharifi, Ghazal](#)
Subject: RE: Lyles - PIC issues and discovery
Date: Friday, October 18, 2019 2:00:15 PM
Attachments: [image004.png](#)
[image003.png](#)
[Lyles10-18-19 - Training Descriptors with HIGHLIGHTS.docx](#)

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All,

Attached please find the chart reflecting our meet and confer. On those trainings that we need to follow up on, they are reflected in the notes.

Matt, for Judge Spearman's update - please note:

- SPD will produce item Nos. 1-5 from Mr. Guilmette's discovery request .
- For discovery request No. 6 – SPD agrees to produce all the records identified as “agree” on the chart. SPD maintains its objections on other items highlighted in red. SPD also objects to all trainings pre-2014 (not reflected in the chart)
- SPD objects to item Nos. 7-15 requested in Mr. Guilmette's discovery as beyond the scope of the Inquest.

I will strive to have a discovery document detailing our objections by our hearing this next week or very shortly thereafter.

Best,
Ghazal

As to the trainings detailed in



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From: Sharifi, Ghazal <Ghazal.Sharifi@seattle.gov>
Sent: Thursday, October 17, 2019 1:39 PM
To: Corey Guilmette <corey.guilmette@defender.org>
Cc: Anderson, Matthew <Matt.Anderson@kingcounty.gov>; Anne Roberson <anner@stritmatter.com>; Boatright, Rebecca <Rebecca.Boatright@seattle.gov>; Sylve, Dee <Dee.Sylve@kingcounty.gov>; Elodie Daquila <Elodie@stritmatter.com>; emoore@ehmpc.com; Litfin, Jennifer M <Jennifer.Litfin@seattle.gov>; Karenk@stritmatter.com; kcobb@freybuck.com; Nakata, Kelly <Kelly.Nakata@seattle.gov>; Lisa Benedetti <Lisa@stritmatter.com>; Lisa Smith <lsmith@freybuck.com>; Matthew Kniffen <mkniffen@freybuck.com>; Melanie@stritmatter.com; prachi.dave@defender.org; Ted Buck <tbuck@freybuck.com>; Wolf, Jeff M <Jeff.Wolf@seattle.gov>; Sharifi, Ghazal <Ghazal.Sharifi@seattle.gov>
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SPD respectfully disagrees. Without scope or a witness list, this issue is very premature. I cannot speak on behalf of officers not identified or contacted and it would be an unfair expectation to do so less than a week from today.



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From: Corey Guilmette <corey.guilmette@defender.org>
Sent: Thursday, October 17, 2019 1:36 PM
To: Sharifi, Ghazal <Ghazal.Sharifi@seattle.gov>
Cc: Anderson, Matthew <Matt.Anderson@kingcounty.gov>; Anne Roberson <anner@stritmatter.com>; Boatright, Rebecca <Rebecca.Boatright@seattle.gov>; Sylve, Dee <Dee.Sylve@kingcounty.gov>; Elodie Daquila <Elodie@stritmatter.com>; emoore@ehmpc.com; Litfin, Jennifer M <Jennifer.Litfin@seattle.gov>; Karenk@stritmatter.com; kcobb@freybuck.com; Nakata, Kelly <Kelly.Nakata@seattle.gov>; Lisa Benedetti <Lisa@stritmatter.com>; Lisa Smith <lsmith@freybuck.com>; Matthew Kniffen <mkniffen@freybuck.com>; Melanie@stritmatter.com; prachi.dave@defender.org; Ted Buck <tbuck@freybuck.com>; Wolf, Jeff M <Jeff.Wolf@seattle.gov>
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Thanks Matt, we are fine with the discovery chart being shared.

We plan on conducting officer interviews, as have occurred in past inquests. These interviews will definitely include Officers Anderson and McNew. We will also want to review the physical evidence. We will likely request other interviews. If SPD or the involved officers anticipate that they will refuse to cooperate in these interviews, I think we would benefit from addressing this. While I understand it may be premature to brief the issue at this point since we don't have an interview list, I don't want to want to wait on this issue and end up needing to delay the inquest (or significantly condense briefing timelines) as a result. Depending on the next pre-inquest conference date and the inquest date, it may make to set a timeline to address these issues at the next inquest.

Beyond that, the maternal family doesn't have any other issues to add.

Corey Guilmette

Pronouns: he, him

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On Thu, Oct 17, 2019 at 11:23 AM Sharifi, Ghazal <Ghazal.Sharifi@seattle.gov> wrote:

Matt,

Thank you. As to the three items below:

- SPD will not be in a position to meaningfully discuss the length of the inquest until the scope is defined. Will this happen at the hearing or in an order to follow?
- Same issue as above. My schedule for a 4 week trial is distinctly different than that of a 2 week trial.
- Does the Administrator want oral argument on specific issues within the briefing or everything involved?

We will get you the chart.

Thanks,
Ghazal



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From: Anderson, Matthew <Matt.Anderson@kingcounty.gov>

Sent: Thursday, October 17, 2019 10:43 AM

To: Anne Roberson <anner@stritmatter.com>; Boatright, Rebecca <Rebecca.Boatright@seattle.gov>; corey.guilmette@defender.org; Sylve, Dee <Dee.Sylve@kingcounty.gov>; Elodie Daquila <Elodie@stritmatter.com>; emoore@ehmpc.com; Sharifi, Ghazal <Ghazal.Sharifi@seattle.gov>; Litfin, Jennifer M <Jennifer.Litfin@seattle.gov>; Karenk@stritmatter.com; kcobb@freybuck.com; Nakata, Kelly <Kelly.Nakata@seattle.gov>; Lisa Benedetti <Lisa@stritmatter.com>; Lisa Smith <lsmith@freybuck.com>; Matthew Kniffen <mkniffen@freybuck.com>; Melanie@stritmatter.com; prachi.dave@defender.org; Ted Buck <tbuck@freybuck.com>; Wolf, Jeff M <Jeff.Wolf@seattle.gov>

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Hello all. I'm digging out from your (and others) prodigious briefings and will be forwarding a list of issues at the Lyles PIC. It'll include:

- Expected length of inquest
- A request for your schedules for relevant months
- Matters for oral argument (including the matters briefed)

Please send me other proposed issues for consideration.

Also, is there any objection to forwarding an updated copy of the list of trainings with descriptions and an indication of agreements/etc to IA Spearman so that he can have it before? I can update it with my notes from the meeting, or if anyone else is already doing that, that would be great.

Thanks, I'll get a more polished list out hopefully later today.