

OFFICE OF THE COUNTY COUNSEL
COUNTY OF SANTA CLARA

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August 31, 2009

Geoffrey Mangers
4124 Ross Park Dr.
San Jose, CA 95118-1761

Re: *Geoffrey Mangers v. County of Santa Clara, et al.*
Case No. 1-08-CV109152

Dear Mr. Mangers:

I received from District Attorney Dolores Carr's executive assistant one letter, one e-mail, and multiple voice mails that you forwarded to Ms. Carr regarding the above-referenced matter. I previously explained to you that I represent District Attorney Carr in this matter and that all communications with District Attorney Carr regarding this case (whether they are issues pertaining to your original complaint, first amended complaint, or your intended second amended complaint) are to be directed to me.

In your letter to District Attorney Carr you specifically reference the fact that I have instructed you not to communicate directly with her regarding this case. I again reiterate that I am District Attorney Carr's legal representative in this matter and that you shall not communicate directly with her (or any other defendant on whose behalf I have appeared in this case) in any manner respecting this litigation. You are free to initiate communications with District Attorney Carr on any other matters as she is an elected official representing the interests of the County and its citizens. I understand from your representations to the court that you intend to include in your second amended complaint some, if not all, of the allegations from your original complaint. Based upon that representation, it is improper for you to communicate with District Attorney Carr regarding any of the existing or potential allegations in this matter. After you file your second amended complaint we will hopefully have a better understanding of the relevant issues and can reassess which topics you may and may not address to District Attorney Carr.

In your letter to District Attorney Carr you also inform her that I have represented to you that I forwarded page 13 of your pleadings to her with your request that she read it and decide whether she would like to join you as a plaintiff. You further represent that I have not informed you of her decision in that regard. It is my recollection that I informed you that she is not

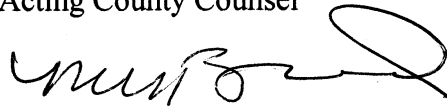
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interested in joining you as a plaintiff. If I neglected to make that clear to you, then please accept this letter as notification that my client is not interested in joining your case as a plaintiff.

Should you persist in trying to communicate with District Attorney Carr on the issues raised in your pleadings, I will have no choice but to bring this to the court's attention and seek an order prohibiting you from engaging in such contact.

Very truly yours,

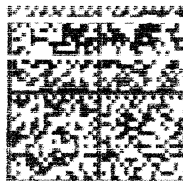
MIGUEL MÁRQUEZ
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c: Dolores Carr, District Attorney

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