

II.

Defendant **CHIEF SALVAGGIO, CITY MANAGER KUENSTLER, and COUNCILMEMBERS RODRIGUEZ, CHARLES and ALCOCER** object to the wording “any memoranda, writings, or other records referring to Mr. Bradshaw...” This request if read literally, would include all emails, and other documents concerning Councilman Bradshaw during his tenure at City Council. Defendants object to the overbroad nature and limitless timespan of said request. *Sines v. Kessler*, 325 Frd. 563, 566 (E.D. La. May 17, 2018). Defendants, in the spirit of good faith cooperation, will be producing documents concerning the 3.12 hearing, his ethics hearing or his alleged misconduct and any communications thereof that are not privileged by attorney/client privilege.

Defendants’ counsel has communicated with Plaintiff’s counsel for the purposes of the hearing on October 27, 2020. While Defense counsel does not anticipate any issue concerning these objections, Defendants are specifically filing these objections under Rule 45 concerning the overbroad nature of the literal meaning of the duces tecum and to any attorney/client communications.

WHEREFORE, PREMISES CONSIDERED, Defendants **CITY OF LEON VALLEY OFFICIALS SALVAGGIO, KUENSTLER, RODRIGUEZ, CHARLES and ALCOCER** file these Objections to the Plaintiff’s Subpoenas Duces Tecum and request for such other and further relief, to which they may show themselves justly entitled.

Respectfully submitted,

LAW OFFICES OF CHARLES S. FRIGERIO

A Professional Corporation

Riverview Towers

111 Soledad, Suite 840

San Antonio, Texas 78205

(210) 271-7877

(210) 271-0602 Telefax

Email: csfrigeriolaw@sbcglobal.net

frigeriolaw1995@sbcglobal.net

BY: /s/ Charles S. Frigerio

CHARLES S. FRIGERIO

SBN: 07477500

ATTORNEY-IN-CHARGE

HECTOR X. SAENZ

SBN: 17514850

**ATTORNEYS FOR DEFENDANTS CHIEF JOSEPH SALVAGGIO,
CITY MANAGER KELLY KUENSTLER, CITY COUNCILMEMBERS
DR. CATHERINE RODRIGUEZ, DONNA CHARLES AND
MONICA ALCOCER**

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of October, 2020, I electronically filed the foregoing Defendants Objections to Plaintiff's Subpoenas Duces Tecum or in the Alternative Expedited Hearing on Temporary Injunction to with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Brandon J. Grable
Grable Law Firm PLLC
1603 Babcock Road, Suite 118
San Antonio, Texas 78229

Mr. Solomon M. Radner
Ms. Madeline M. Sinkovich
EXCOLO LAW, PLLC
26700 Lahser Road, Suite 401
Southfield, MI 48033

/s/ Charles S. Frigerio
CHARLES S. FRIGERIO