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4 1851 Bassett St.  
5 #509  
6 Denver, CO 80202  
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7 UNITED STATES DISTRICT COURT  
8 IN THE DISTRICT OF COLORADO

9 RAYMOND LYALL, GARRY ANDERSON, THOMAS  
10 PETERSON, JERRY RODERICK BURTON,  
11 FREDRICK JACKSON, BRIAN COOKS, WILLIAM  
12 PEPPER, CHRISTOPHER FARRELL, KRYSTAL  
13 MCEVOY INDIVIDUALLY ON BEHALF OF  
14 THEMSELVES AND ALL OTHERS SIMILARLY  
15 SITUATED;

16 Plaintiffs,

17 vs.

18 CITY OF DENVER, A MUNICIPAL CORPORATION,  
19 MAYOR MICHAEL B. HANCOCK, POLICE CHIEF  
20 ROBERT C. WHITE, DENVER PUBLIC WORKS  
21 MANAGER JOSE M. CORNEJO, MAYOR'S CHIEF-  
22 OF-STAFF EVAN DREYER, COMMANDER  
23 ANTONIO LOPEZ: IN THEIR OFFICIAL  
24 CAPACITIES;

25 Defendants

Case No.: 16-2155

**CLASS ACTION**

**PLAINTIFFS SECOND REQUESTS FOR  
PRODUCTION**

**DEMAND FOR JURY TRIAL**

26 **PLAINTIFFS' FED R CIV. P 34 SECOND REQUEST FOR PRODUCTION OF**  
27 **DOCUMENTS**

28 TO: Defendants City of Denver, Mayor Michael B. Hancock, Denver Police Chief Robert White,  
29 Denver Public Works Manager Jose M. Cornejo, Deputy Chief of Staff Evan Dreyer &  
30 Commander Anthony Lopez ("Defendants");  
31

1 **INSTRUCTIONS**

2 1. All instructions and non-disputed definition from Plaintiffs First Set of Requests for  
3 Production are incorporated by reference herein.  
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6 **REQUEST 6:** All documents, including videos, social media postings, and screen shots, that  
7 Defendant Denver Police have obtained in their monitoring of Denver Homeless Out Loud.  
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11 Respectfully submitted this 14th day of January 2017,

12 s/Jason Flores-Williams, Esq.

13 *Counsel for Plaintiffs*

14 Phone: 303-514-4524

15 Email: Jfw@jfwlaw.net

16 1851 Bassett St.

17 #509

18 Denver, Colorado 80202  
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23 **CERTIFICATE OF SERVICE**

24  
25 I hereby certify that on this 14th day of January, 2017 a true and correct copy of the foregoing  
26 was served upon the following:

27 s/Jason Flores-Williams

28 Dated: 1/14/17

29 Wendy J. Shea

30 Conor D. Farley

31 Cristina Peña Helm  
32

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