

WHAT IS A PUBLIC RECORDS REQUEST?

- The California Public Records Act (CPRA) requires public institutions to disclose all records containing information relating to the conduct of its business prepared, owned, used, or retained by the entity. [Gov't. Code § 6250]
- Such laws are often referred to as *Sunshine Laws*.

WHAT IS A PUBLIC RECORD?

Public records include:

“any writing containing information relating to the conduct of the public’s business prepared, owned, used or retained by any state or local agency, **regardless** of physical form or characteristics.”

- This includes not just the records that we create, but *any record in our possession.*

WHAT CONSTITUTES A “WRITING”?

Every means of recording upon any form of communication or representation...

Papers

Exhibits

Maps and Drawings

Books

Photographs

Email

Optical Disks

CDs/DVDs

Computerized Data

Voicemail

Video and Audio Tapes

Text Messages



THE RIGHT TO ACCESS PUBLIC RECORDS

- *Anybody* can initiate a Public Records Act request.
- Access to public records does **not** require a written request.
- The motive of the requestor is generally irrelevant. Idle curiosity is perfectly acceptable.
- The agency may never make records available only in electronic form.
- The agency **must** provide assistance to the requester by helping to identify records and information relevant to the request and suggesting ways to overcome any practical basis for denying access.
- There are several exemptions to disclosure allowed under CPRA which might prevent the release of records or portions thereof.

A Note About Emails...



- Keep in mind when you are crafting emails that they may have to be produced to a news reporter and you could be embarrassed by publication of your comments.
- Using your personal email account (i.e. – gmail, hotmail, etc.) to conduct University business does NOT get you off the hook.
- Emails to colleagues in other states may be subject to other state open records laws and FOIA.



The Time to Respond

- The agency has up to 10 *calendar* days to determine whether or not responsive records exist and/or whether the request will be denied pursuant to a legal privilege.
- Once the determination has been made that there are responsive records, the agency shall promptly notify the requestor of the estimated date that they will be made available.
- The 10-day time limit may be extended up to 14 additional days if any of the following “unusual circumstances” are involved:



When the Extension is Allowed:


- The need to search and collect records from field facilities that are separate from the office processing the request.
- The need to search for, collect and appropriately examine a voluminous amount of separate and distinct records.
- The need for consultation with another agency that has an interest in the documents.
- The need to write programming language or write a computer program or to construct a computer report to extract data.

Protocols and Procedures

- **If a request is made directly to your department:**
 - Make note of the **exact** date that you received the request and **immediately** forward it to the Information Practices (IP) department at records@ucla.edu for coordinating and tracking.
 - Please provide context if known.

Protocols and Procedures

- **If you receive notification from the Information Practices office to search for records:**
 - Carefully review the request to see what is being sought and immediately begin the search for records that might be responsive.
 - If your department is not the correct custodian of such records, please guide us in the right direction if possible.
 - Either way, please respond to inform us of *whether or not* your department has the requested records.
 - If you **do** have the records, please promptly give us an estimate of the volume involved and how long it will take for your department to gather them.



Be realistic when providing us estimates about the volume of records, potential problems, and the availability date.

What to Keep in Mind

- It is okay if no records exist. No need to create a record.
- Attachments *are* to be considered part of the record.
- If there is a document that has the requested information and is not otherwise privileged or exempt from disclosure, it needs to be produced, *even if it includes other (non-privileged) information.*
- Timeliness is extremely important.

What Else to Keep in Mind

- Provide context to us when possible.
- Provide records to *us*, not the requester!
- When you are responding to a request, please let us know to which portion you are responding.
- Never give us originals, only copies.

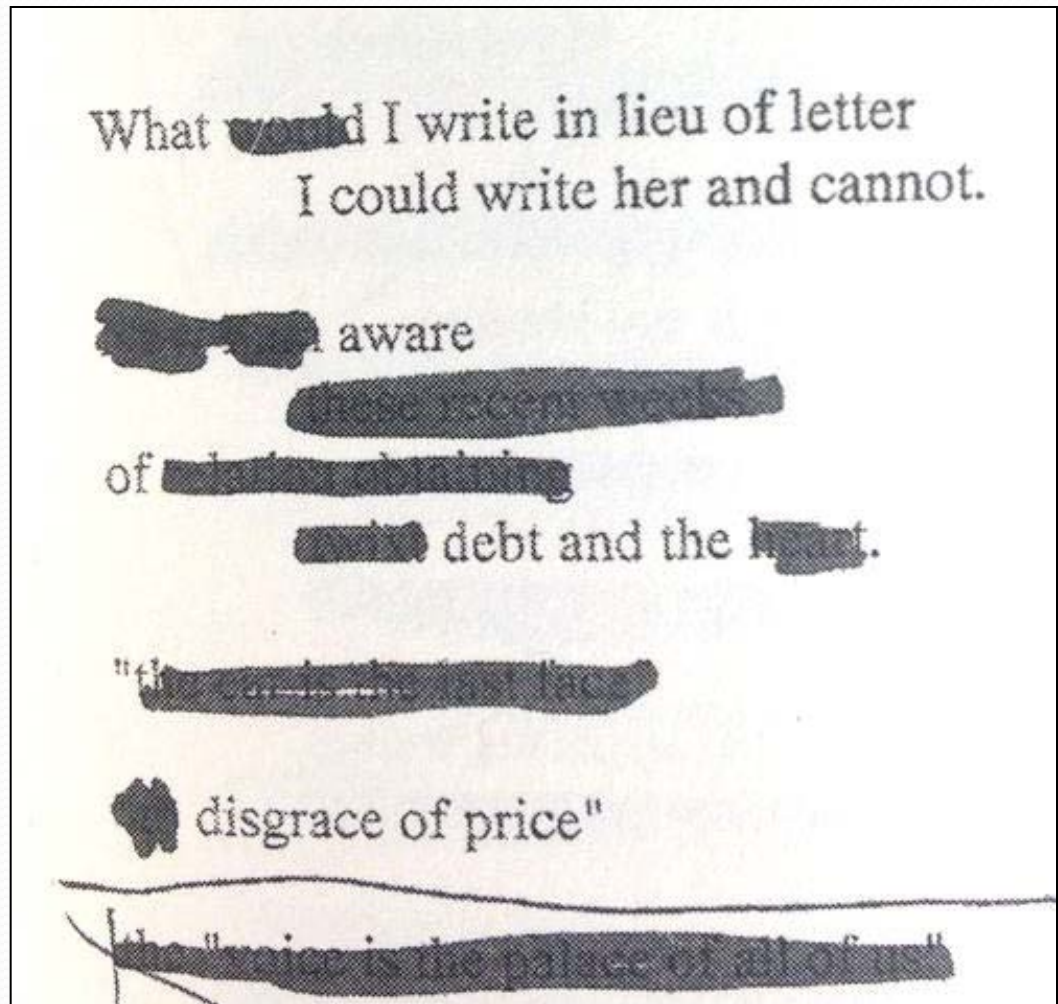
Sensitive Information & Redactions

- If a record contains both exempt and non-exempt information, the agency must segregate the two, and, using redaction, produce the non-exempt information.
- Please provide us the records unredacted.
 - However, if the document has someone's social security number on it, please redact all but the last four digits of the number before sending it to anybody.
- It is helpful, though, if you point out areas that you believe are sensitive and possibly need redaction.

Sample Redactions – Less Effective

Redactions applied by use of a black marker are not as clean and precise as those that are applied electronically.

More importantly, the text underneath is often still visible when the ink dries and/or the document is scanned.



What Else to Keep in Mind

- In general it's best to forward all potentially responsive documents to us to let us decide if they are responsive and/or if any privileges exist.
 - If we have any questions about possible privileges or other legalities, we always confer with Campus Counsel for their opinion.
 - Nothing gets released to the public without very thorough reviews!
- If possible, please provide the records to us via email or other electronic means, as opposed to hard copies.
- Remember ...



... We're in this thing together.

We're here to help.

So What Are We Allowed to Charge?

How much can be charged for staff time spent on researching, retrieving, reviewing, assembling, redacting, handling, re-filing, and/or preparing the responsive records?



What Are We Allowed to Charge?

- Answer:

Nothing! Public institutions cannot charge for the labor involved!



Are We Allowed to Charge?

Can we charge for copies made of documents?



Are We Allowed to Charge?

For hard copies...  (\$0.25 per page)

Copies of PDFs... 

We can only charge for the "direct cost" of duplicating. Therefore we are allowed to recover the costs of making copies at the copier, such as for paper and toner, but since multiple copies of PDF files can be easily created on a computer in a matter of seconds, we cannot charge for that.

- **Access is always free.** Fees for "inspection" or "processing" are prohibited.

Are We Allowed to Charge?

■ Caveat Regarding Data in Electronic Format

The Requestor must bear the cost of producing a record of the data if:

- Compliance requires the agency to produce a copy of the electronic record and the record is only produced at otherwise regularly scheduled intervals; and/or
- The production requested would require data compilation, extraction or programming.

So Why Do We Care About Responding?

- Responses are legally **REQUIRED**.
- Time frames are **MANDATED**.
- Potential agency embarrassment.
- Enforcement rights of requesters under CPRA include litigation, with potential liability for attorneys' fees.

PRA Exemptions

- Exemptions - § 6254:
 - Preliminary drafts not kept after final
 - Pending litigation records where UC is a party
 - Personnel, medical or other records whose disclosure would be an unwarranted invasion of privacy

PRA Exemptions Cont.

- Police files, including investigatory or security files compiled by any state or local police agency.
- Real estate appraisals may be withheld until the property is acquired.
- Exemptions based on prohibitions of disclosure under federal or state law, including provisions in Evidence Code relating to privilege.

Privilege Exemptions

- Doctor-patient and attorney-client/attorney work product privileges.
- “Official Information” privilege. “Official information” is “information acquired in confidence by a public employee in the course of his or her duty and not open, or officially disclosed, to the public prior to the time the claim of privilege is made”. Subject to balancing the public interest in non-disclosure vs. the public interest in disclosure.

Privilege Exemptions Cont.

- “Trade Secret” privilege. “Trade Secret” is defined as “information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

Privilege Exemptions Cont.

- Includes any other state or federal law protecting records: HIPAA, CMIA, and FERPA

Exemptions Cont.

- Catch-all Exemption - § 6255:
“On the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.”
- The standard is the *public’s* interest, not institution’s interest.
- Keep in mind it is the institution’s burden to prove application of an exemption and law favors transparency.
- Scholarly communications of faculty and deliberative process privilege subject to balancing.

Scholarly Communications

- Communication with colleagues, students, staff, or other collaborators about research or relating to the development of courses.
- Disclosure could impair the academic research process by impeding candid and informal communications.
- Under the balancing test, these records are carefully considered for exemption in consultation with faculty, legal counsel, Chair of Academic Senate, Vice Chancellor Academic Personnel.

Deliberative Process

- Very limited application under the balancing test.
- Only protects records that contain discussion of a pending administrative matters before a decision has been rendered to protect the decision-making process.
- Once the decision is made, the records are no longer subject to protection.

UC Electronic Communications Policy

- Any record on a University network or computer is considered to be a University record, including personal records (until review of the records can confirm the personal nature).
- Any record NOT on a University network or computer is still considered a University record if it relates to University business.
- Public records must be collected regardless of whether they reside on University or personal networks or computers.
- Note: Encryption of documents or email does not exempt them. Encrypted data must be accessible even if the person with the key is not available.

PRIVACY

- IPA
 - Prevents disclosure of personal information.
 - Disclosure pursuant to public records request permitted if not an unwarranted invasion of privacy.
 - Disclosure pursuant to subpoena permitted.
- FERPA
 - Prevents disclosure of student records.
 - Disclosure pursuant to subpoena permitted.

Privacy Cont.

- HIPAA
 - Limits when individually identifiable health information may be disclosed by a licensed healthcare facility.
- CMIA: Confidentiality of Medical Information Act
 - Limits when a healthcare provider may disclose “medical information”.
- May disclose subject to subpoenas with notice to consumer/patient or with consent.



Subpoenas



What is a Subpoena?

- A subpoena is a legal document that requires a person to give testimony and/or to produce evidence in a court case.
- It carries the weight of a court-order.
- Subpoenas are directed to people who are not parties to the case, but who are believed to have evidence that would support certain facts at issue.
- Although it might name a specific person to respond, subpoenas are often simply directed to the “Custodian of Records” for a department, or the “Person Most Knowledgeable.”

Facts About Subpoenas

- A subpoena must specify the time and place that testimony is needed, or that documents are to be made available, and also must provide a summary of
 - (1) the nature of the deposition and/or records required;
 - (2) the rights and duties of the deponent/witness; and
 - (3) the penalties for disobedience of the subpoena.
- If testimony is requested, it could be for you to be a witness in court or for a deposition prior to trial.
 - If testimony is requested, please contact Campus Counsel, who can best assist and advise you with that.

Service of Subpoenas

- If someone tries to serve a subpoena to you, unless you are the designated Legal Process Coordinator for those types of records, please direct the process server to Records Management.



- If you receive a subpoena in the mail or it is left with you even after you instruct the server to go to the appropriate office:
 - Please note the date and time of receipt, along with how the documents were served (by mail, fax, or personal service), and promptly forward the subpoena with that information to Records Management.

Challenges to Subpoenas

- A subpoena may be opposed or challenged on a number of substantive and procedural grounds.
 - (e.g., overly burdensome, lack of relevance of the categories of records or testimony sought, or defects in form or service of the subpoena itself)
- Challenges may be raised by UCLA or a party to the litigation in which the subpoena is issued.
- A subpoena that is substantively or procedurally defective may be challenged by procedures such as a motion to quash or a motion for a protective order.

Subpoena Deadlines

- **Testimony**. Although no specific amount of time in advance of the deposition date is required to command a deponent's attendance, sufficient time is required to allow the deponent to locate and produce any designated documents or items.
- **Records Only**. Where the subpoena seeks the production of records only (and does not require personal attendance at deposition), the date for production can be no earlier than 20 days after issuance, or 15 days after service, of the subpoena, whichever date is later.

Penalties for Lack of Response

- **Can be fined \$500 or more.**
 - Failure to appear pursuant to a subpoena forfeits to the party aggrieved the sum of five hundred dollars (\$500), **and** all damages that he or she may sustain by the failure of the person to appear. (*Code of Civil Procedure section 1992*)
- **A warrant can be issued for contempt, ordering the arrest of the person named in the subpoena.**
 - A deponent who disobeys a deposition subpoena ... may be punished for contempt ... without the necessity of a prior order of court directing compliance by the witness. (*Code of Civil Procedure section 2020.240*)
- **Or both!**



Protocols and Procedures

- **If you receive notification from a UCLA office to search for records responsive to a subpoena:**
 - Carefully review the subpoena to see what is being sought and the deadline involved, and immediately begin the search for records that might be responsive.
 - If your department is not the correct custodian of such records, please give guidance (if you are able to) of who best to contact.
 - Either way, please respond as to ***whether or not*** your department has the requested records.

Protocols and Procedures

- **If you receive notification to search for records: (cont.)**
 - If you do have records, please provide an estimate of when we can expect to receive them, taking care to provide them to us *before* the date stated in the subpoena.
 - If the deadline cannot be met, please notify us immediately, so that we may try to get an extension.

What to Keep in Mind

- It is okay if no records exist. No need to create a record.
- Attachments *are* to be considered part of the record.
- Sensitive information may need to be redacted. Counsel will make the call on that.
- Timeliness is extremely important.



Affidavits

- Regardless of the method by which the documents are provided, the custodian must execute an affidavit stating that:
 - (1) he or she is authorized to certify the records;
 - (2) the copies provided are true copies of the records specified in the subpoena (or were delivered to the attorney or authorized representative thereof for copying); or
- If the custodian has none of the records described or only part of those records, he/she must indicate this fact in the affidavit.

So What Are We Allowed to Charge?

How much can be charged for staff time spent on researching, retrieving, reviewing, assembling, redacting, handling, re-filing, and/or preparing the responsive records?



What Are We Allowed to Charge?

\$24 per hour!

So be sure to keep track of the amount of time spent working on it!



Are We Allowed to Charge?

So what can we charge for the copies?



Answer: .10¢ per page.

Who Do I Contact for Subpoena Advice?



- Please contact the Legal Process Coordinator in Records Management or Information Practices for advice.
 - Records Management
 - Elvis Downs, Manager
 - (310) 794-8960
 - UCLARecordsManagement@finance.ucla.edu
 - Information Practices
 - Robert Baldrige, Manager
 - (310) 794-8741
 - records@ucla.edu



Producing Information in the Litigation Process

Dewey, Cheatum & Howe
Attorneys for Plaintiff

Superior Court of the State of California, County
of Los Angeles

Silly Sally,
Plaintiff,

)

Case No. 10920

)

v.

)

Complaint for Damages

)

The Regents of the University)

Of California)

Defendant.)

)

EXAMPLES OF LAWSUITS

- ▣ Damage or loss of property allegedly caused by University acts or omissions
- ▣ Injuries allegedly incurred while on University property
- ▣ Injuries allegedly caused by University personnel
- ▣ Employment practices-wrongful termination, retaliation, hostile work environment, protected status (alleged disability, race, gender, sex or age discrimination)

INQUIRY



What is Evidence?

“Evidence” means testimony, writings, material objects or other things presented to the senses that are offered to prove the existence or nonexistence of a fact. (CA Evidence §140)

Incident / injury report form

Please print clearly and tick the correct box

Status: Employee Contractor Other

Outcome: Near miss Injury

1. DETAILS OF INJURED PERSON

Name: _____ Phone: (H) _____ (W) _____

Address: _____ Sex: M F

Date of birth: _____

Position: _____

Experience in the job: _____ (years/months)

Start time: _____ am pm

Work arrangement: Casual Full-time Part-time Other

2. DETAILS OF INCIDENT

Date: _____ Time: _____

Location: _____

Describe what happened and how: _____

3. DETAILS OF WITNESSES

Name: _____ Phone: (H) _____ (W) _____

Address: _____

4. DETAILS OF INJURY

Nature of injury (eg burn, cut, sprain) _____

Cause of injury (eg fall, grabbed by person) _____

Location on body (eg back, left forearm) _____

Agency (eg lounge chair, another person, hot water) _____

5. TREATMENT ADMINISTERED

First Aid given Yes No

First Aider name: _____

Treatment: _____

Referred to: _____

Photos or Video

What is Discovery?

- ▣ The exchange of information during litigation.
- ▣ Documents, things, and/or witnesses

Discovery Requests

Plaintiffs May Serve The Regents With:

- ▣ Request for Production of Documents *
- ▣ Interrogatories - Form and Special
- ▣ Requests for Admissions
- ▣ Requests for Inspection
- ▣ Notice of Deposition
- ▣ Request for Medical Examination

What are Writings?

“Writing” means handwriting, typing, printing, Photostatting, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations, thereof, and any record thereby created, regardless of the manner in which the record has been stored. (CA Evidence §250)

Example

- ▣ On June 11, 2013 a vehicle collision occurred between a UCLA vehicle driven by employee Joe, and Sally who was driving her vehicle, at the intersection of Charles E. Young Drive West and Strathmore. Employee Hal was sitting in the front passenger seat of the UCLA vehicle. Hal was injured as a result of the collision.

Sally immediately files and serves a lawsuit against The Regents. Her lawyer serves Discovery.

1. Request for Production of Documents including all writings, photographs, videos, reports, and notes pertaining to the collision between UCLA's vehicle and Sally's vehicle.

Do we need to produce?

2. Request for inspection of the UCLA vehicle.

Do we need to make the vehicle available for inspection?

3. Sally also requests production of Medical records, EMT records, treating physician notes, X-rays, MRIs, lab reports, and medical reports pertaining to Hal who was injured in the June 11th collision.

Do we produce Hal's medical records?

4. Sally requests production of Joe's driving record while operating campus vehicles during the last 10 years of his employment at UCLA.

Produce or do not produce?

Sally requests production of Joe's driving record while operating campus vehicles during the last 10 years of his employment at UCLA.

5. What if 2 years earlier, while on the job at UCLA Joe had forgotten to set the brake on a campus vehicle causing it to roll down hill and crash into a fire hydrant.

Produce or do not produce?

Request for Production of all documents pertaining to Joe's driving record for the last 10 years.

6. Consider: except for the collision involving Sally and the incident with the brake, Joe has an outstanding driving record at UCLA. Joe's director was in the process of writing a letter recommending Joe for the safe driver of the year award but the letter was only in draft version, not finalized.

Produce or Not Produce?

Request for Production of all documents pertaining to Joe's driving record for the last 10 years.

7. Joe's director, depart. supervisor, and every employee in Joe's department who operates UCLA vehicles keeps records of their individual driving histories.

Produce or Not Produce?

Sally seeks production of reports reflecting all vehicle accidents involving all employees in Joe's department in the last 10 years.

8. Although all employees in Joe's department keep records of their driving histories, the department has never compiled this data.

Is the department required to create a report?

Sally seeks production of reports reflecting all vehicle accidents involving all employees in Joe's department in the last 10 years.

9. What if Joe's department annually compiles employee driver histories but only retains this information for 3 years as part of the department's retention policy?

What do we do?

Keep in Mind

- ▣ All handwritten, typewritten, photocopies, drawings
- ▣ All versions-rough draft to final, duplicates, even with handwritten notations
- ▣ All sources
- ▣ All locations

Responding to Discovery Under Penalty of Perjury

- ▣ You know the information to be true and correct to my own personal knowledge
- ▣ Verification signed under penalty of perjury.

e-Discovery & Preservation of Documents

Ryann E. Nieves

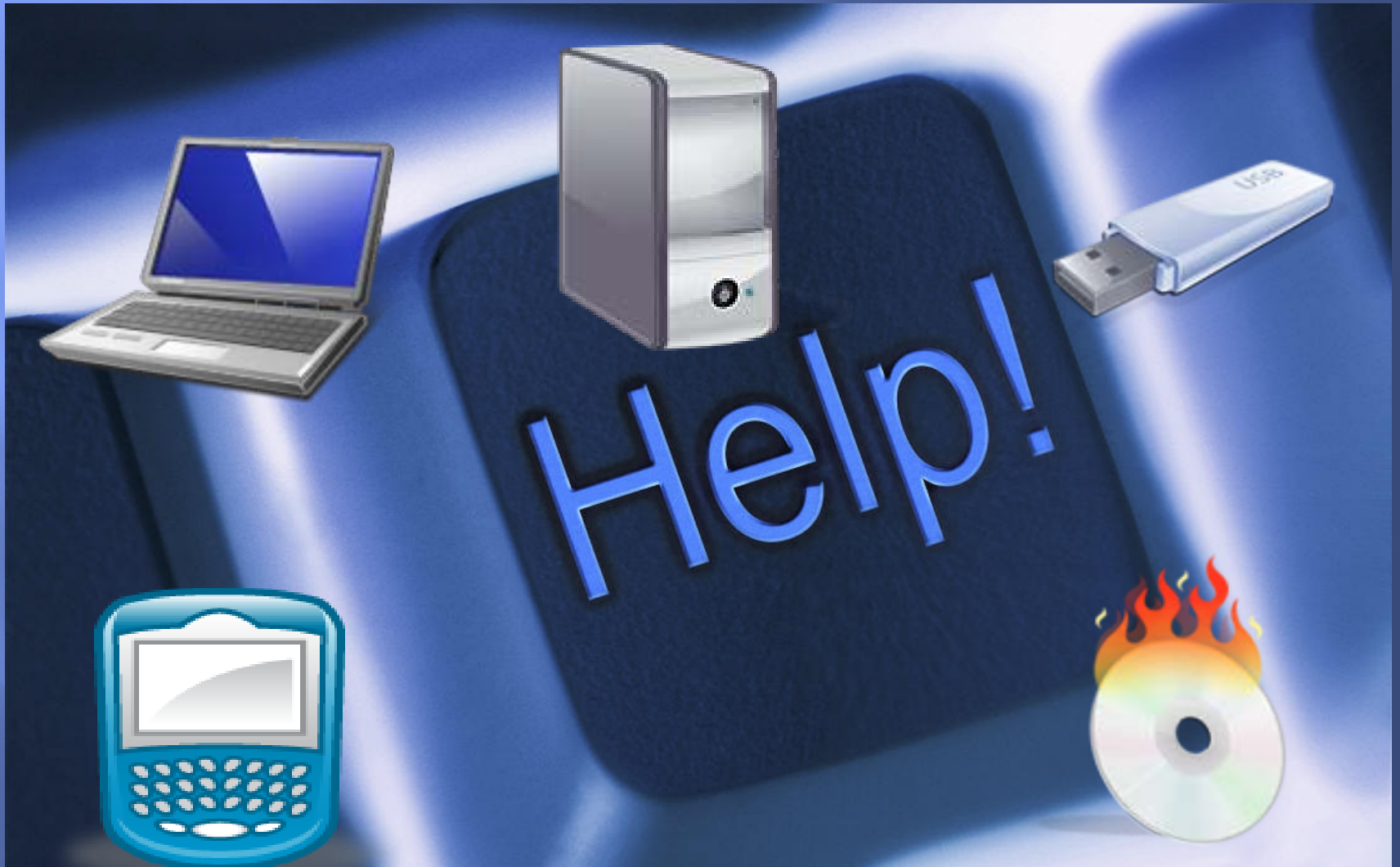
e-Discovery & Administrative Litigation Coordinator

What is e-Discovery?

- ▣ The exchange of information in the electronic format during litigation
- ▣ Known as “electronically stored information” (ESI)

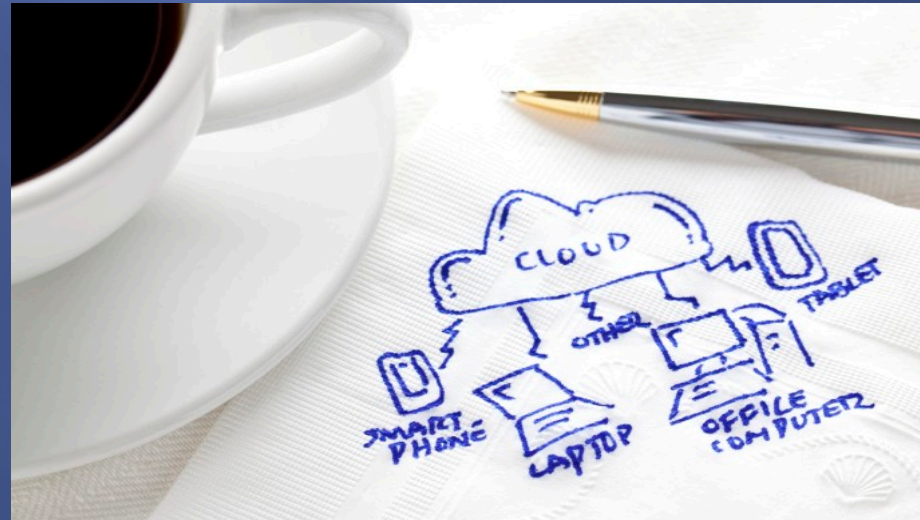
Life As We Knew It

The World Today



Examples of ESI

- Emails
- Email Archives
- Word Processing
- Calendars
- Instant Messages/chats
- Text Messages
- Spreadsheets
- Video/photos
- Voice Recordings
- Websites
- Documents in the “cloud”
- Any other ESI which may be relevant evidence in a lawsuit



Overview of UCLA Procedures

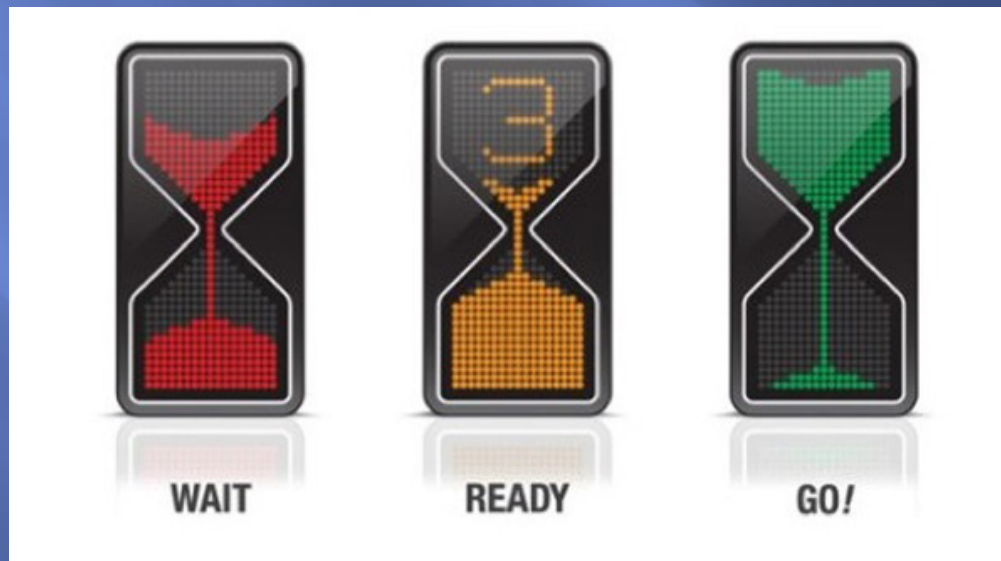
- ▣ 1. Identify When a Duty to Preserve Arises
- ▣ 2. Conduct Inquiry re “Key Players” and Existing Data
- ▣ 3. Provide Notice of Duty to Preserve
- ▣ 4. Decide What to Retain
- ▣ 5. Collect and Retain Data
- ▣ 6. Create and Maintain Written Records of Efforts

1. Identify When a Duty to Preserve Arises

- ▣ An ESI hold is triggered when the University “reasonably should know that the evidence may be relevant to *anticipated* litigation.”
 - ▣ Examples:
 - Complaint with EEOC, DFEH, OCR
 - Demand letter received
 - Specific and repeated inquiries/complaints
 - Press or industry interest
 - Lawsuit filed

Time is of the Essence

- ▣ Measures to preserve ESI should be done as soon as possible.



2. Conduct Inquiry

- ▣ Who are the Key Players?
 - e.g. Human Resources, Workers Comp, Whistleblower Office and other individuals involved in the matter
- ▣ Who are the relevant IT representatives?
- ▣ What active data exists with key players?
- ▣ What are the back up tape use and retention procedures?
- ▣ Decision made about retention of ESI. This is done on a case by case basis depending on the type of ESI and department IT infrastructure

3. Provide Notice of Duty to Preserve

- ▣ Send preservation hold letters to all identified “key players”
- ▣ Send preservation hold letters to relevant IT representatives
- ▣ Receive confirmations from all recipients
- ▣ Send periodic reminder notices (90 day reminders)

Do I have to Comply?

- ▣ Yes!!!
- ▣ The University including its officers, employees and agents must comply with a preservation request

You've Received a Preservation Letter, Now What?

- ▣ Immediately send an email acknowledgement stating “I have received this notice and will comply”
- ▣ Identify what to retain
- ▣ Segregate and preserve

4. Decide What to Retain

- ▣ Save all potentially relevant ESI on active systems
 - Local Area Network (desktops)
 - Email Server
 - Hard drive
 - Portable Storage
 - ▣ External hard drives, flash drives, memory cards, thumb drives, memory sticks, DVD/CD-ROMs, Floppy disks, Zip disks etc.
 - Laptops
 - iPhone/Blackberry, other Smartphone or tablet
 - The Cloud

4. Decide What to Retain Cont.

- ▣ Back-up tapes [Case-by-Case assessment]
 - Duplicative of active data:
 - ▣ If active data is already being preserved, then recycling of tapes can continue
 - *SOLE* source of potentially relevant data:
 - ▣ If ESI on back up tapes is not available from readily accessible sources, then tapes may need to be preserved
 - Used as archive:
 - ▣ If data on tape is made available upon request, it is similar to active data

5. Collect and Retain Data

- ▣ Most ESI is backed up on the department and/or email server or saved onto a CD and retained by the e-discovery office so as to maintain a clear chain of custody regarding evidence
- ▣ ESI that is preserved, remains confidential and is not reviewed until litigation

Email Preservation Folders

▣ ENTERPRISE MESSAGING EMAIL

■ Inbox

▣ Preserved Evidence

- Joe Bruin Preservation
- Joe Bruin Preservation – Privileged

▣ MEDNET EMAIL

■ Inbox

▣ Managed Folders

- JOE BRUIN Preservation
- JOE BRUIN Preservation – Privileged

Personal Devices and Accounts?

- ▣ Yes, if your personal email accounts, computers, and/or devices contain University business, then they too, are subject to preservation.
- ▣ REMEMBER: All locations that contain relevant evidence must be preserved.

Former Employees

- ▣ Consider the employment status at the time of preservation:
 - Current employee receives preservation request then separates
 - ▣ Preservation must continue
 - 1st notice of a preservation request includes a separated employee
 - ▣ Work with IT to preserve remaining email accounts and network data

6. Create and Maintain Written Records of Efforts

- ▣ Retained reasonably accessible ESI
- ▣ Retained ESI not reasonably accessible
- ▣ ESI not retained and reasons for decision
- ▣ Notices and receipts of preservation requests
- ▣ Confirmations of preservation
- ▣ Periodic reminders
- ▣ Notices of release from preservation duty

Key Points to Remember

- ▣ ESI is regularly and routinely available
- ▣ Accessible data is generally stored in a readily usable format that need not be restored or otherwise manipulated to be usable.

Key Points to Remember Cont.

- ▣ Before litigation is reasonably anticipated, routine operations that destroy ESI are okay
- ▣ If recycling of back up tapes is part of routine operations, it's okay
- ▣ If deleting accounts is part of routine operations, it's okay

Not Reasonably Accessible

- ❑ Back up tapes for disaster recovery only
- ❑ Don't use back up tapes for archival purposes
- ❑ Only store back up tapes for the shortest time necessary to restore services in the event of a true disaster
- ❑ Legacy data from obsolete systems

What's the Worst That Can Happen?

- ▣ Judgment
- ▣ Adverse Finding
- ▣ Adverse Inference
- ▣ Money

Preservation v. Production

- ▣ Preserving does not necessarily mean producing!
- ▣ Non-litigated matters v. Litigation
- ▣ Relevancy and production will take place if a lawsuit is filed and discovery is requested. The attorneys will decide what is subject to privilege and what can be produced.

Production & Redaction

- ▣ Personal information
- ▣ PHI
- ▣ FERPA
- ▣ Confidential, proprietary information such as donor information
- ▣ The University **only** has **30 days** to respond to a litigation document request

Release of Duty to Preserve

- ▣ After a lawsuit is either dismissed, settled, or a judgment is finalized including the appeals process
- ▣ Once a non-litigated matter is concluded and all paperwork is finalized
- ▣ Expiration of the Statute of Limitations

Links

- ▣ UCLA Preservation Practices:
 - <http://www.campuscounsel.ucla.edu/documents/UCLA%20PRACTICES%20FOR%20ESI.pdf>

- ▣ Electronic Communications Policy
 - ▣ <http://policy.ucop.edu/doc/7000470/ElectronicCommunications>