REQUEST FOR ADMISSION NO. 4:

Admit that YOU obtained from a closed-session meeting of the Ojai City Council an attorney-client memorandum written by a lawyer from the law firm Shute, Mihaly and Weinberger LLP to the City of Ojai.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU shared with the Ojai Valley News at least some of the contents of an attorney-client memorandum written by a lawyer from the law firm Shute, Mihaly and Weinberger LLP to the City of Ojai.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU posted to a public website at least some of the contents of the contents of an attorney-client memorandum written by a lawyer from the law firm Shute, Mihaly and Weinberger LLP to the City of Ojai.

REQUEST FOR ADMISSION NO. 7:

Admit that YOU recorded, on an electronic device in your possession, at least some of a closed-session meeting of the Ojai City Council.

REQUEST FOR ADMISSION NO. 8:

With respect to the recording referenced in Request For Admission Number 7, above, admit that YOU were not authorized to record any part of the closed-session meeting of the Ojai City Council.

REQUEST FOR ADMISSION NO. 9:

Admit that in 2024 YOU disclosed to the public confidential information obtained from a closed-session meeting of the Ojai City Council.

REQUEST FOR ADMISSION NO. 10:

Admit that in 2025 YOU disclosed to the public confidential information obtained from a closed-session meeting of the Ojai City Council.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU disclosed to the public contents of settlement discussions conducted during a closed-session meeting of the Ojai City Council, involving YOUR claim for indemnity against the City of Ojai regarding the INSTANT CASE.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU disclosed to the public the settlement position of the City of Ojai with respect to YOUR claim for indemnity involving the INSTANT CASE.

DATED: December 4, 2025,

LAW OFFICE OF BRIAN ACREE

By _____
Brian Acree
Attorney for Plaintiffs,
DAVID BYRNE
VICKIE CARLTON- BYRNE
THOMAS DREW MASHBURN
GERALD SCHWANKE
JOEL MAHARRY
DOUGLAS LA BARRE
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Attorney for Defendant LESLIE RULE

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF VENTURA
Unlimited

BYRNE, ET AL., Plaintiffs, vs. RULE, ET AL., Defendants.	Case No. 2023CUMC008352 **DEFENDANT RULES'S RESPONSES TO REQUEST FOR ADMISSIONS SET NO. ONE**

PROPOUNDING PARTY: **PLAINTIFFS**
RESPONDING PARTY: **DEFENDANT LESLIE RULE**
SET NO.: ONE (1)

TO: PLAINTIFFS AND THEIR ATTORNEYS OF RECORD HEREIN:

In general, discovery continues and is not yet complete. Defendant reserves the right to adduce additional, later-discovered facts.

Defendant provides the following responses to Request For Admissions, Set No. One:

Response to Request For Admission No. 1: DENY.

Response to Request For Admission No. 2: DENY.

Response to Request For Admission No. 3: OBJECTION: seeks information protected by the attorny/client priviledge.

Response to Request For Admission No. 4: ADMIT.

Response to Request For Admission No. 5: DENY.

Response to Request For Admission No. 6: DENY.

Response to Request For Admission No. 7: DEFENDANT RULE ASSERTS HER RIGHTS UNDER THE FIFTH AMENDMENT OF THE U.S. CONSTITUTION NOT TO RESPOND TO THIS REQUEST.

Response to Request For Admission No. 8: ADMIT.

Response to Request For Admission No. 9: Defendant alleges that she does not possess information or belief sufficient either to admit or deny this request, and on that basis, denies it.

Response to Request For Admission No. 10: Defendant alleges that she

does not possess information or belief sufficient either to admit or deny this request, and on that basis, denies it.

Response to Request For Admission No. 11: DENY.

Response to Request For Admission No. 12: Admit that defendant RULE openly stated that an offer made to her by the City of Ojai was not acceptable; save and except as expressly admitted here, defendant RULE denies the request.

DATED: 1/27/26

Respectfully submitted,
LAW OFFICES OF STEVEN ROOD

Steven Rood, Esq.
Attorney for Defendant LESLIE RULE

VERIFICATION

I, LESLIE RULE, declare that I have read the foregoing **RESPONSE TO FORM INTERROGATORIES, SET ONE AND RESPONSE TO REQUEST FOR ADMISSIONS, SET ONE** and know that their contents are true of my own knowledge and belief except as to matters which are stated upon information and belief. As to those matters, I believe their contents to be true. I declare under penalty of perjury under the laws of the State of California, in Ojai, California, that the foregoing is true and correct.

Executed on January 27, 2026.



LESLIE RULE