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CELESTINE



CITY OF PHILADELPHIA PLANNING COMMISSION,
Appellant,
v.
FAYE ANDERSON,
Appellee.

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**
DECEMBER TERM, 2023
No. 0944
LEAD CASE

CITY OF PHILADELPHIA MAYOR'S OFFICE,
Appellant,
v.
FAYE ANDERSON,
Appellee.

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**
DECEMBER TERM, 2023
No. 2522
CONSOLIDATED

CITY OF PHILADELPHIA,
Appellant,
v.
FAYE ANDERSON,
Appellee.

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**
JANUARY TERM, 2024
No. 2443
CONSOLIDATED

**STIPULATION AND ORDER FOR THE PRODUCTION OF DOCUMENTS AND
ADJOURNMENT OF BRIEFING DEADLINE AND ORAL ARGUMENT**

Appellants, the City of Philadelphia Planning Commission, the City of Philadelphia Mayor's Office, and the City of Philadelphia (collectively "the City"), and Appellee, Faye Anderson, hereby stipulate and agree as follows:

STPAP-In Re: Appeal Of City Of Philadelphia Planning Com



Case ID: 231200944
Control No.: 24062049

1. By June 28, 2024, the City will produce electronic copies of the public, non-privileged, and non-exempt records responsive to the three Right to Know Law requests of Ms. Anderson from approximately the first half of the records search results.

2. By July 15, 2024, the City will produce another set of the public, non-privileged, and non-exempt responsive records to Ms. Anderson from approximately the next quarter of the records search results

3. By July 31, 2024, the City will produce the final set of the public, non-privileged, and non-exempt responsive records to Ms. Anderson from approximately the last quarter of the records search results.

4. By August 30, 2024, the City will produce an exemption log containing the following details for any records that the City withholds or redacts as exempt and/or privileged: the date, type of record, author with title or status, recipients with title or status, subject matter, and citation to the legal basis for withholding or redacting the records.

5. The City may withhold or redact records that it believes, in good faith are privileged and/or exempt from production under the Pennsylvania Right to Know Law and/or other applicable laws. The appellee may challenge the privileges and exemptions claimed by the City in writing within fifteen days of receiving the City's exemption log. The parties will then try to reach an agreement regarding these records.

6. If an agreement between the parties cannot be reached regarding any challenges to the claimed privileges, exemptions, and redactions, the issues may be resolved with briefs to the Court and oral argument, the deadlines for which will be proposed jointly to the Court in a mutually agreed-upon schedule, if needed.

7. The City agrees that no fees for the duplication or production of records to Ms.

Anderson will be assessed or charged in the instant consolidated matters, without affecting the City's ability to assess and charge applicable fees under the Pennsylvania Right to Know Law in the future.

8. The parties may jointly agree to adjust the above-stated production and exemption log obligations and schedule at any time.

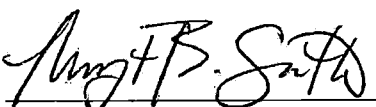
9. Upon production of the above-identified records and exemption log, and resolution of any challenges to the privileges, exemptions, and redactions asserted by the City, the parties will agree to stipulate that this statutory appeal will be settled, discontinued, and ended.

10. In light of the above stipulations, the City's deadline to submit its brief on July 1, 2024, the appellee's deadline to submit a reply brief by August 5, 2024, and oral argument to be scheduled after September 3, 2024 are hereby adjourned.

11. By October 7, 2024, the parties will submit a status report in which they will advise the court of what, if any, further Court involvement in this matter may be needed, up to and including proposing a jointly agreed-upon briefing schedule if briefing is required to resolve any challenges or disputes about any asserted privileges, exemptions, and redactions to the responsive records.

**CITY OF PHILADELPHIA LAW
DEPARTMENT**

**REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS**

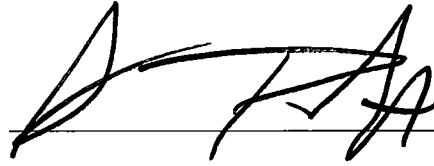
By:  6/11/24
MARGOT B. SMITH
Deputy City Solicitor – Right to Know
Compliance & Legislation Group
City of Philadelphia Law Department
One Parkway Building, 17th Floor
1515 Arch Street
Philadelphia, PA 19102

By: /s/ Paula Knudsen Burke 6/11/24
PAULA KNUDSEN BURKE
Local Legal Initiative Attorney
(Pennsylvania)
4000 Crums Mill Rd., Ste. 101
Harrisburg, PA 17112

ORDER

AND NOW, this 17 day of June, 2024, it is hereby ORDERED and
DECREED that the above stipulation by the parties is hereby APPROVED.

BY THE COURT:


_____ J.