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Attorneys for Petitioner, Association of Deputy District  
Attorneys for Los Angeles County (ADDA)

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

ASSOCIATION OF DEPUTY DISTRICT  
ATTORNEYS FOR LOS ANGELES  
COUNTY (ADDA),

Petitioner,

v.

GEORGE GASCÓN, LOS ANGELES  
COUNTY DISTRICT ATTORNEY; LOS  
ANGELES COUNTY DISTRICT  
ATTORNEY'S OFFICE; COUNTY OF  
LOS ANGELES; DOES 1 through 50,  
inclusive,

Respondents.

Case No. 21STCP03412

**PETITIONER'S EVIDENTIARY  
OBJECTIONS TO DECLARATION  
OF STANLEY YEN IN SUPPORT  
OF RESPONDENTS' OPPOSITION  
TO OSC RE: PRELIMINARY  
INJUNCTION**

Date: November 10, 2021  
Time: 9:30 a.m.  
Place: Dept. 86

Petitioner, ASSOCIATION OF DEPUTY DISTRICT ATTORNEYS FOR LOS ANGELES COUNTY (ADDA), hereby object to portions of the evidence filed by Respondents, GEORGE GASCON, LOS ANGELES COUNTY DISTRICT ATTORNEY; LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE; COUNTY OF LOS ANGELES, in reply to Respondents' Opposition to OSC Re: Preliminary Injunction. Petitioner respectfully requests that the Court strike the objectionable portions of the evidence as specifically set forth below.

**PETITIONER'S OBJECTIONS TO EVIDENCE PRESENTED BY DEFENDANTS**

Material Objected to:	Grounds for Objection:	Ruling:
<p>Yen Decl. ¶ 8, Ins. 4-15</p> <p>Thereafter, in late December of 2020, the DA's Office consulted with CEO, DHR, and County Counsel to transfer Deputy Public Defender (DPD) III, Alisa Blair, to serve as a special advisor to the DA in the capacity of Deputy District Attorney (DDA) III. DHR reviewed and approved the administrative reassignment to the DA's Office as it was appropriate under Civil Service Rules 15.03. DHR determined the DPD III and DDA III classes are of the same rank, there is no increase in grade, and the employee demonstrated the possession of the skills and aptitudes required in the position to be changed. The CEO also approved the Exception to Hire for the transfer. The transfer was not based on merit (i.e. civil service exam), but rather, based on the employee's experience and the needs of the DA's Office. Non-promotional inter-department transfers and change in classification such as a DPD III to DDA III does not require a County employee to take a competitive civil service examination to effect the transfer. The transfer became effective on January 4, 2021.</p>	<p>1) Hearsay (California Evid. Code § 1200, <i>et seq.</i>)</p> <p>2) Lack of Personal Knowledge (California Evid. Code § 702)</p> <p>Reflects hearsay statements relied upon by the Declarant to assert the various acts, activities and conclusions of DHR</p>	<p>Sustained: _____</p> <p>Overruled: _____</p> <p>Judge</p>

1 Yen Decl. ¶ 9, Ins. 21-25  
 2 ...the employee demonstrated the  
 3 possession of the skills and aptitudes  
 4 required in the position to be  
 5 changed. The CEO also approved  
 6 the Exception to Hire for the  
 7 transfer. The transfer was not based  
 8 on merit (i.e. civil service exam),  
 9 but rather, based on the employee's  
 10 experience and the needs of the DA's  
 Office. Non-promotional inter-  
 department transfers and change in  
 classification such as a DPD IV to  
 DDA IV does not require a County  
 employee to take a competitive civil  
 service examination to effect the  
 transfer.

1) Hearsay  
 (California Evid. Code § 1200, *et*  
*seq.*)  
 2) Lack of Personal Knowledge  
 (California Evid. Code § 702)  
 ¶ 9, Ins. 21-25 are predicated on  
 hearsay statements.

Sustained: \_\_\_\_\_  
 Overruled: \_\_\_\_\_  
 Judge

11 Yen Decl. ¶ 10, Ins. 1-8  
 12 DHR reviewed and approved the  
 13 administrative reassignment to the  
 14 DA's Office as it was appropriate  
 15 under Civil Service Rules 15.03.  
 16 DHR determined the DPD IV and  
 17 DDA IV classes are of the same  
 18 rank, there is no increase in grade,  
 19 and the employee demonstrated the  
 20 possession of the skills and  
 21 aptitudes required in the position to  
 22 be changed. The CEO also approved  
 the Exception to Hire for the transfer.  
 The transfer was not based on merit  
 (i.e. civil service exam), but rather,  
 based on the employee's experience  
 and the needs of the DA's Office.  
 Non-promotional inter-department  
 transfers and change in classification  
 such as a DPD IV to DDA IV does  
 not require a County employee to  
 take a competitive civil service  
 examination to effect the transfer.

1) Hearsay  
 (California Evid. Code § 1200, *et*  
*seq.*)  
 2) Lack of Personal Knowledge  
 (California Evid. Code § 702)  
 ¶ 10, Ins. 1-8 are predicated on  
 hearsay statements.

Sustained: \_\_\_\_\_  
 Overruled: \_\_\_\_\_  
 Judge

24 Dated: November 3, 2021

Respectfully submitted,

THE GIBBONS FIRM, PC

By: Elizabeth J. Gibbons  
 Elizabeth J. Gibbons  
 Attorneys for Petitioner, Association of Deputy  
 District Attorneys for Los Angeles County  
 (ADDA)

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA )  
3 COUNTY OF LOS ANGELES ) ss.

4 I am a citizen of the United States; I am over the age of eighteen years and not a  
5 party to the within action; my business address is 811 Wilshire Boulevard, 17th Floor, Los  
6 Angeles, California 90017.

7 On the date written below, I served the within:

8 **PETITIONER'S EVIDENTIARY OBJECTIONS TO DECLARATION OF**  
9 **STANLEY YEN IN SUPPORT OF RESPONDENTS' OPPOSITION TO**  
10 **OSC RE: PRELIMINARY INJUNCTION**  
11 *Association of Deputy District Attorneys for Los Angeles County (ADDA) v.*  
12 *George Gascón, Los Angeles County District Attorney, et al.*  
13 LASC Case No. 21STCP03412

14 on the interested parties in said action as follows:

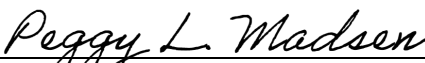
15 Justin H. Sanders (SBN 211488)  
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25 Los Angeles, CA 90017

26 [ X ] **BY MAIL:** I am readily familiar with the firm's practice of collection and  
27 processing correspondence by mailing. Under that practice, it would be deposited with the U.S.  
28 Postal Service on that same day with postage fully prepared at Los Angeles, California in the  
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 3, 2021 at Los Angeles, California.

  
\_\_\_\_\_  
Peggy Madsen