

1 Justin H. Sanders (SBN 211488)
jsanders@sandersroberts.com
2 Sabrina C. Narain (SBN 299471)
snarain@sandersroberts.com
3 Shawn P. Thomas (SBN 302593)
sthomas@sandersroberts.com
4 Matthew D. Barzman (SBN 309063)
mbarzman@sandersroberts.com
5 **SANDERS ROBERTS LLP**
1055 West 7th Street, Suite 3200
6 Los Angeles, CA 90017
Telephone: (213) 426-5000
7 Facsimile: (213) 234-4581

8 Attorneys for Respondents
GEORGE GASCON; LOS ANGELES
9 **COUNTY DISTRICT ATTORNEY; LOS**
10 **ANGELES COUNTY DISTRICT AND**
11 **COUNTY OF LOS ANGELES**



12 SUPERIOR COURT OF CALIFORNIA
13 COUNTY OF LOS ANGELES

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

17 Petitioner,

18 v.

19 GEORGE GASCON, LOS ANGELES
20 COUNTY DISTRICT ATTORNEY; LOS
21 ANGELES COUNTY DISTRICT
22 ATTORNEY'S OFFICE; COUNTY OF LOS
23 ANGELES, DOES 1 through 50, inclusive,

24 Respondents.

CASE NO. 21STCP03412

**RESPONDENTS' REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
MOTION TO STAY ALL PROCEEDINGS
AND DISCOVERY**

Judge: Hon. Mitchell L. Beckloff

Hearing Information

DATE: January 14, 2021

TIME: 9:30 a.m.

LOCATION: Dept. 86, Stanley Mosk
Courthouse, 111 N. Hill Street, Los Angeles, CA
90012



1 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Pursuant to California Rules of Court, rule 3.1350 and California Evidence Code section
3 452 et seq., Respondents GEORGE GASCON, LOS ANGELES COUNTY DISTRICT
4 ATTORNEY; LOS ANGELES COUNTY DISTRICT ATTORNEY’S OFFICE; and COUNTY
5 OF LOS ANGELES (hereinafter “Respondents”) respectfully request that this Court take judicial
6 notice of the following:

7 1. That Petitioner’s counsel, Ms. Elizabeth Gibbons, represents the nine DDAs in
8 their appeals filed before the Civil Service Commission hearings, as described in the
9 Declaration of Justin H. Sanders, ¶¶ 3-4, Exhibits 1-2 thereto;

10 2. The appeals filed before the Civil Service Commission by Mr. Eric Siddall and Ms.
11 Maria Ghobadi, as described in the Declaration of Justin H. Sanders, ¶¶ 3-4, Exhibits 1-2
12 thereto.

13 3. The Civil Service Commission Meeting Minutes, as described in the Declaration of
14 Justin H. Sanders 5-6, 9, Exhibits 3-4, 6 thereto, as available on the Civil Service
15 Commission’s website, located at
16 [https://lacounty.gov/compub/?department=compub&lang=&querytext=*&searchTerm=1&](https://lacounty.gov/compub/?department=compub&lang=&querytext=*&searchTerm=1&deptType=com&agency=Civil+Service&Minutes=1&rowsPerPage=10)
17 [deptType=com&agency=Civil+Service&Minutes=1&rowsPerPage=10.](https://lacounty.gov/compub/?department=compub&lang=&querytext=*&searchTerm=1&deptType=com&agency=Civil+Service&Minutes=1&rowsPerPage=10)

18 California Evidence Code section 452, subd. (b) provides that judicial notice may be taken
19 of “[r]egulations and legislative enactments issued by or under the authority of the United States
20 or any public entity in the United States official acts of the legislative, executive, and judicial
21 departments of the United States and of any state of the United States.” Evidence Code section
22 452 subd. (c) provides that “[o]fficial acts of the legislative, executive, and judicial departments of
23 the United States and of any state of the United States” may be judicially noticed.

24 Evidence Code section 452 subd. (d) provides that “[r]ecords of (1) any court of this state
25 or (2) any court of record of the United States or of any state of the United States,” may be
26 judicially noticed. Evidence Code 452 subd. (g) provides that “[f]acts and propositions that are of
27 such common knowledge within the territorial jurisdiction of the court that they cannot reasonably
28 be the subject of dispute” may be judicially noticed. 452 subd. (h) provides that “[f]acts and



1 propositions that are not reasonably subject to dispute and are capable of immediate and accurate
2 determination by resort to sources of reasonably indisputable accuracy” may be judicially noticed.

3 Request for Judicial Notice (“RJN”) Number 1 is for judicial notice that Ms. Elizabeth
4 Gibbons represents the Petitioner in this action and all nine appellants before the Civil Service
5 Commission in their pending appeals contesting the validity of the transfers of attorneys Shelan
6 Joseph, Tiffany Blacknell, Nancy Theberge from Deputy Public Defender IV positions to Deputy
7 District Attorney IV positions, Alisa Blair and John Perroni from Deputy Public Defender III
8 positions to Deputy District Attorney III positions, and Gregory Apt from Deputy Alternate Public
9 Defender IV (from the Alternate Public Defender’s office) to District Attorney IV. Having made
10 her appearance before this court, and having signed and filed the nine pending appeals, and having
11 appeared before the Commission on all related hearings; thus, Ms. Gibbons’ representation may be
12 noticed under Evid. Code § 452(d), (g), and (h), as it is not reasonably subject to dispute, and
13 readily verifiable through Commission filings, that Ms. Gibbons represents Petitioners in this
14 action and appellants before the Commission on the same issues and grievances.

15 RJN number 2 seeks appeals filed before the Civil Service Commission by Mr. Eric
16 Siddall and Ms. Maria Ghobadi, which is an administrative law court, and thus the appeals filed
17 their may be noticed under Evid. Code § 452(d).

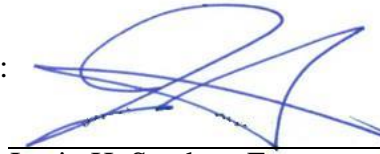
18 Finally, the Meeting minutes of the County of Los Angeles’ Civil Service Commission,
19 acting under the authority of the County Charter and Civil Service Rules, i.e. regulations and
20 legislative enactments made via a public entity commission, may be judicially noticed under Evid.
21 Code § 452(b), (d).

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1 Dated: December 21, 2021

SANDERS ROBERTS LLP

2
3 By:



4
5 Justin H. Sanders, Esq.

Sabrina C. Narain, Esq.

6 Shawn P. Thomas, Esq.

Matthew Barzman, Esq.

Attorneys for Respondents

7 **GEORGE GASCON; LOS ANGELES COUNTY**
8 **DISTRICT ATTORNEY; LOS ANGELES COUNTY**
9 **DISTRICT AND COUNTY OF LOS ANGELES**



1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I, Blanca Reyes am a citizen of the United States, over 18 years of age and am not a party
4 to the within action. My business address is 1055 W. 7th Street, Suite 3200, Los Angeles, CA
5 90017, which is located in the County of Los Angeles where the service took place. My electronic
6 service address is: breyes@sandersroberts.com.

7 On December 21, 2021 I served the foregoing document(s) described as:

8 **RESPONDENTS' REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO
9 STAY ALL PROCEEDINGS AND DISCOVERY**

10 on all interested parties in this action by placing a true and correct copy thereof enclosed
11 in a sealed envelope addressed as stated in the attached service list:

- 12 **VIA MAIL** I am readily familiar with this office's practice for collection and processing
13 of correspondence for mailing with the U.S. Postal Service. Per that practice the within
14 correspondence will be deposited with the U.S. Postal Service on the same day shown on
15 this affidavit in a sealed envelope with postage fully prepaid in the ordinary course of
16 business.
- 17 **VIA FACSIMILE** I caused such document to be transmitted via facsimile to the
18 addressee(s) from the facsimile machine of Sanders Roberts LLP whose fax number is
19 (213) 234-4581 . No error was reported by the machine and pursuant to Rule 2008(e)(3), I
20 caused the machine to print a record of the transmission.
- 21 **VIA ELECTRONIC MAIL** I caused a PDF version of the documents to be transmitted
22 by electronic mail to the party(s) identified on the attached service list using the e-mail
23 address(es) indicated, per their stipulation. I did not receive, within a reasonable time after
24 transmission, any electronic message or other indication that the transmission(s) were
25 unsuccessful.
- 26 **VIA PERSONAL SERVICE** I caused such envelope(s) to be delivered by a process
27 server employed by Express Network the attached documents to the office(s) of the
28 addressee.
- VIA OVERNIGHT DELIVERY (FEDERAL EXPRESS)** I caused the attached
document(s) to be delivered via overnight delivery to the recipients shown on the attached
service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
December 21, 2021, at Los Angeles, California.

/s/ Blanca Reyes
Blanca Reyes



SERVICE LIST

ADDA vs. George Gascon, et al.

LASC - Case No.: 21STCP03412

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4 THE GIBBONS FIRM, P.C.
5 Elizabeth J. Gibbons, Esq.
6 811 Wilshire Blvd., 17th Floor
7 Los Angeles, CA 90017
8 Tel. (323) 591-6000
9 egibbons@thegibbonsfirm.com
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Attorneys for Petitioner
**ASSOCIATION OF DEPUTY
DISTRICT ATTORNEYS FOR LOS
ANGELES COUNTY (ADDA)**

