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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

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

Petitioner,

v.

GEORGE GASCON, 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

**[PROPOSED]
ORDER TO SHOW CAUSE RE:
PRELIMINARY INJUNCTION**

**[PROPOSED]
TEMPORARY
RESTRAINING ORDER**

[Rule 3.1150(c), Cal. Rules of Court]

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

The Ex Parte Application of Petitioner ADDA for a Temporary Restraining Order and Order to Show Cause why a preliminary and permanent injunction should not issue, came on regularly for hearing on October 14, 2021 at 8:30 a.m. in Department 86 of the above-entitled Court. After reviewing the papers and pleadings filed by the parties herein, after hearing oral arguments on behalf of the parties, and it appearing to the satisfaction of the Court that this is a proper case for granting an Order to Show Cause and Temporary Restraining Order, on the basis that unless an Order To Show Cause and a

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1 Temporary Restraining Order are granted, great or irreparable injury will result to
2 Petitioner before the matter can be heard on notice:

3 **ORDER TO SHOW CAUSE**

4 **IT IS HEREBY ORDERED** that Respondents George Gascon, Los
5 Angeles County District Attorney's Office, and County of Los Angeles shall appear
6 before this Court on the _____ day of October, 2021, at 9:30 a.m., or as soon thereafter
7 as the matter may be heard, in Department 86 of this Court, located at 111 North Hill
8 Street, Los Angeles, California 90012, and then and there show cause, if any, why
9 preliminary and permanent injunctions should not be entered preliminarily and
10 permanently enjoining and prohibiting Respondents, and each of them, as well as their
11 officers, agents, servants, representatives, subordinate officers, employees, and all
12 persons acting in concert or participating with them, pending the complete litigation of
13 this action as well as of the related appeals which are presently pending before the Los
14 Angeles County Civil Service Commission, from committing or performing, directly or
15 indirectly, any and all of the following acts:

- 16 A. Hiring, transferring, or appointing any public defender, or any other
17 person who is unqualified pursuant to Civil Service Rules 6.01, 6.02,
18 15.02, 15.03, 7.04, 7.06, 11.01, and 25, to hold any position as a
19 Deputy District Attorney II, III, IV, or V, while this litigation and the
20 litigation of any and all hearings on appeals granted by the Civil
21 Service Commission to contest the actions of Respondents Gascon,
22 DAO, and County in hiring Tiffany Blacknell, Shelan Joseph, and
23 Alisa Blair in violation of the Civil Service Rules and the County
24 Charter remains pending; and
- 25 B. Taking any steps to expire, or otherwise invalidate the existing
26 eligible lists for the positions of DDA III, DDA IV, and/or DDA V
27 while this litigation and the litigation of any and all hearings on
28 appeals granted by the Civil Service Commission to contest the

1 actions of Respondents Gascon, DAO, and County in hiring Tiffany
2 Blacknell, Shelan Joseph, and Alisa Blair in violation of the Civil
3 Service Rules and the County Charter remains pending, unless an
4 examination which complies with Civil Service Rules 5, 6, 7, 11, and
5 25 is properly offered, scored, and calculated, and a replacement
6 eligible list of qualified candidates for the position has been certified
7 and published.

8 **BRIEFING SCHEDULE ON OSC**

9 **IT IS FURTHER ORDERED** that Petitioner's Petition for Writ of
10 Mandate and Complaint for Injunctive Relief, together with Petitioner's Ex Parte
11 Application, with all supporting documents, are deemed filed and served on this date,
12 October 14, 2021.

13 Supplemental Points and Authorities shall be filed and served by email
14 upon counsel for the Respondents on or before October ____, 2021 at 5:00 p.m.

15 Opposition papers shall be filed and served upon counsel for Petitioners by
16 email on or before October ____, 2021 at 5:00 p.m.

17 Reply papers shall be filed and served upon counsel for the Respondents by
18 email on or before October ____, 2021 at 5:00 p.m.

19 **TEMPORARY RESTRAINING ORDER**

20 **IT IS FURTHER ORDERED** that pending the hearing on the Order to
21 Show Cause, Respondents, and each of them, as well as their officers, agents, servants,
22 representatives, subordinate officers, employees, and all persons acting in concert or
23 participating with them, are hereby temporarily restrained and enjoined from committing
24 or performing, directly or indirectly, any and all of the following acts:

- 25 A. Hiring, transferring, or appointing any public defender, or any other
26 person who is unqualified pursuant to Civil Service Rules 6.01, 6.02,
27 15.02, 15.03, 7.04, 7.06, 11.01, and 25, to hold any position as a
28 Deputy District Attorney II, III, IV, or V; and

1 B. Taking any steps to expire, or otherwise invalidate the existing
2 eligible lists for the positions of DDA III, DDA IV, and/or DDA V
3 while this litigation and the litigation of any and all hearings on
4 appeals granted by the Civil Service Commission to contest the
5 actions of Respondents Gascon, DAO, and County in hiring Tiffany
6 Blacknell, Shelan Joseph, and Alisa Blair in violation of the Civil
7 Service Rules and the County Charter remains pending, unless an
8 examination which complies with Civil Service Rules 5, 6, 7, 11, and
9 25 is properly offered, scored, and calculated, and a replacement
10 eligible list of qualified candidates for the position has been certified
11 and published.

12 **IT IS SO ORDERED**

13 DATED: October 15, 2021

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16 JUDGE OF THE SUPERIOR COURT
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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.

6 On the date written below, I served the within:
7 **[PROPOSED] ORDER TO SHOW CAUSE RE: PRELIMINARY**
8 **INJUNCTION; [PROPOSED] TEMPORARY RESTRAINING**
9 **ORDER**
10 *Association of Deputy District Attorneys for Los Angeles County (ADDA) v.*
11 *George Gascon, Los Angeles County District Attorney, et al.*
12 LASC Case No. 21STCP03412

13 on the interested parties in said action as follows:

14 James Oldendorph
15 Liebert Cassidy Whitmore
16 6033 West Century Boulevard, 5th Floor
17 Los Angeles, CA 90045
18 joldendorph@lcwlegal.com

19 **[X] BY MAIL:** I am readily familiar with the firm’s practice of collection and
20 processing correspondence by mailing. Under that practice, it would be deposited with the U.S.
21 Postal Service on that same day with postage fully prepared at Los Angeles, California in the
22 ordinary course of business. I am aware that on motion of the party served, service is presumed
23 invalid if postal cancellation date or postage meter date is more than one day after date of deposit
24 for mailing in affidavit.

25 **[X] BY ELECTRONIC MAIL (E-MAIL):** I transmitted the document(s) via
26 electronic mail using web mail through the electronic mail server gmail.com and no error was
27 reported by the mail administrator. Pursuant to California Rules of Court, Rule 2006(d), I
28 printed the confirmation of the e-mail transmission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2021 at Los Angeles, California.

23 *Peggy L. Madsen*
24 _____
25 Peggy Madsen