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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 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

**DECLARATION OF MARIA
GHOBADI IN SUPPORT OF
PETITIONER'S POINTS AND
AUTHORITIES IN REPLY TO
RESPONDENTS' OPPOSITION TO
OSC RE: PRELIMINARY
INJUNCTION**

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

DECLARATION OF MARIA GHOBADI

I, Maria Ghobadi, hereby declare as follows:

1. I am presently employed as a Los Angeles County Deputy District Attorney, and have been so employed since September, 2015. I am currently assigned to the Community Violence Reduction Unit, where I prosecute gang murder cases. I have held this assignment since September, 2019.

2. I make this declaration based on my own personal knowledge of the facts set forth herein, other than facts which are stated to be based on information and belief and as to those facts I believe them to be true.

3. In approximately October, 2019, I took and passed the examination for promotion to DDA Grade III. Based on my exam score, I placed in Band 1 on the promotional list which was published on May 12, 2020.

4. In or about March, 2020, I learned that the County of Los Angeles had issued a County-wide hiring freeze due to the COVID 19 pandemic. This hiring freeze prevented the District Attorney from making any promotions.

5. After learning that the hiring freeze prevented my promotion, I learned that the District Attorney had hired three Deputy Public Defenders to fill one vacant DDA Grade III position and two vacant DDA Grade IV positions. I filed an appeal with the Civil Service Commission to contest these promotions of Deputy Public Defenders over myself and my similarly situated co-workers on the promotion list.

6. Each of my co-workers who were on the DDA Grade III promotion list to whom I spoke about this situation advised me that they were too afraid of retaliation to file an appeal in their own name. For this reason, I agreed to file the appeal with Civil Service on behalf of everyone on the DDA Grade III promotion list. That appeal was filed with the Civil Service Commission in March, 2021.

7. On October 14, 2021, in the late afternoon, I received a telephone call from District Attorney Gascón. Mr. Gascón advised me in that telephone call that I was promoted to DDA Grade III, effective November 1, 2021.

1 8. Because of my involvement in the Civil Service appeals, I was aware that earlier
2 that same day, October 14, 2021, my union, the ADDA, had filed a notice of an ex parte
3 application to be heard the next day, October 15, 2021, in Superior Court, seeking a temporary
4 restraining order to prevent the District Attorney from hiring any more Deputy Public Defenders
5 to fill vacant DDA Grade III and DDA Grade IV positions.

6 9. I was also aware that the ex parte application sought an order preventing the
7 District Attorney from expiring or otherwise killing the promotional lists for available DDA
8 Grade III and DDA Grade IV positions.

9 10. While I was extremely happy to be promoted, it seemed very suspicious to me
10 that I was being advised of a promotion on the same day that my union's ex parte application
11 was filed with the Superior Court. I have been concerned since my October 14, 2021 telephone
12 conversation with Mr. Gascón that the promotion might be denied at a later time.

13 I declare under penalty of perjury that the foregoing is true and correct to the best of my
14 knowledge.

15 Executed this 3rd day of November, 2021 at Los Angeles, California.



MARIA GHOBADI

PROOF OF SERVICE

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

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

On the date written below, I served the within:

**DECLARATION OF MARIA GHOBADI IN SUPPORT OF
PETITIONER'S POINTS AND AUTHORITIES IN REPLY TO
RESPONDENTS' OPPOSITION TO OSC RE: PRELIMINARY
INJUNCTION**

*Association of Deputy District Attorneys for Los Angeles County (ADDA) v.
George Gascón, Los Angeles County District Attorney, et al.*
LASC Case No. 21STCP03412

on the interested parties in said action as follows:

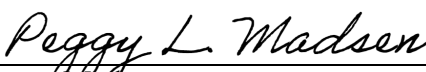
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[X] BY MAIL: I am readily familiar with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepared at Los Angeles,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

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

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

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



Peggy Madsen