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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 CRAIG M. HOETGER IN  
SUPPORT OF RESPONDENTS'  
OPPOSITION TO OSC RE:  
PRELIMINARY INJUNCTION**

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

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

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

Material Objected to:	Grounds for Objection:	Ruling:
Hoetger Decl. ¶ 5, ln. 13  The Commission has the authority and jurisdiction to render a remedy in this case.	1) Inadmissible Opinion (California Evidence Code § 800)  2) Lack of Foundation (California Evid. Code § 403)  3) Conclusions of Law Evidence Code § 310(a)	Sustained: _____  Overruled: _____  Judge

15  
 16 Dated: November 3, 2021

Respectfully submitted,

17 THE GIBBONS FIRM, PC

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

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

8 **PETITIONER'S EVIDENTIARY OBJECTIONS TO DECLARATION OF  
9 CRAIG M. HOETGER IN SUPPORT OF RESPONDENTS' OPPOSITION  
10 TO 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)  
16 jsanders@sandersroberts.com  
17 Sabrina C. Narain (SBN 299471)  
18 snarain@sandersroberts.com  
19 Shawn P. Thomas (SBN 302593)  
20 sthomas@sandersroberts.com  
21 Matthew D. Barzman (SBN 309063)  
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23 **SANDERS ROBERTS LLP**  
24 1055 West 7th Street, Suite 3200  
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  
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 L. Madsen*  
\_\_\_\_\_  
Peggy Madsen