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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.

**REVISED [PROPOSED]  
PRELIMINARY INJUNCTION**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

The Order to Show Cause why a preliminary injunction should not issue, came on regularly for hearing on November 10, 2021 at 9:30 a.m. in Department 86 of the above-entitled Court. After reviewing the papers and pleadings filed by the parties herein, 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 a Preliminary Injunction, on the basis that unless a Preliminary Injunction is granted, further great or irreparable injury will result to the *status quo*, destroying any available remedies to effectively make whole any

1 of Petitioner’s members who have been or will be displaced for promotional positions by  
2 the unlawful lateral transfers of Deputy Public Defenders into Deputy District Attorney  
3 promotional positions, it is therefore

4 **ORDERED, ADJUDGED AND DECREED** that Respondents George  
5 Gascón, Los Angeles County District Attorney, Los Angeles County District Attorney’s  
6 Office, and County of Los Angeles, and each of them, as well as their officers, agents,  
7 servants, representatives, subordinate officers, employees, and all persons acting in  
8 concert or participating with them, pending the complete litigation of this action as well  
9 as of the related appeals which are presently pending before the Los Angeles County  
10 Civil Service Commission, be and hereby are enjoined and prohibited from committing or  
11 performing, directly or indirectly, any and all of the following acts:

12 A. Transferring, re-classifying, or appointing any Los Angeles County  
13 public defender, Los Angeles County alternative public defender, or  
14 any other person who does not meet all the qualifications set forth in  
15 the Job Classification Bulletin for the positions Deputy District  
16 Attorney II, III, IV, or V, to any Deputy District Attorney II, III, IV,  
17 or V position, while the litigation of this Writ of Mandate Petition,  
18 and/or the litigation of any and all hearings on appeals before the Los  
19 Angeles County Civil Service Commission which contest the lateral  
20 transfer or re-classification of Tiffany Blacknell, Shelan Joseph, and  
21 Alisa Blair in violation of the Civil Service Rules and the County  
22 Charter, remains pending or not fully resolved; and

23 B. Taking any steps to expire, or otherwise invalidate the existing  
24 eligible lists for the position of DDA IV, and/or DDA V while the  
25 litigation of this Writ of Mandate Petition, and/or the litigation of  
26 any and all hearings on appeals before the Civil Service Commission  
27 to contest the lateral transfer or re-classification of Tiffany  
28 Blacknell, Shelan Joseph, and Alisa Blair in violation of the Civil

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Service Rules and the County Charter remains pending, unless an examination which complies with Civil Service Rules 5, 6, 7, 11, and 25 is properly offered, scored, and calculated, and a replacement eligible list of qualified candidates for the position has been certified and published.

**IT IS SO ORDERED.**

DATED: November 10, 2021

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HON. MITCHELL L. BECKLOFF  
JUDGE OF THE SUPERIOR COURT

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 **REVISED [PROPOSED] PRELIMINARY INJUNCTION**  
9 *Association of Deputy District Attorneys for Los Angeles County (ADDA) v.*  
10 *George Gascón, Los Angeles County District Attorney, et al.*  
11 LASC Case No. 21STCP03412

12 on the interested parties in said action as follows:

13 Justin H. Sanders (SBN 211488)  
14 jsanders@sandersroberts.com  
15 Sabrina C. Narain (SBN 299471)  
16 snarain@sandersroberts.com  
17 Shawn P. Thomas (SBN 302593)  
18 sthomas@sandersroberts.com  
19 Matthew D. Barzman (SBN 309063)  
20 mbarzman@sandersroberts.com  
21 **SANDERS ROBERTS LLP**  
22 1055 West 7th Street, Suite 3200  
23 Los Angeles, CA 90017

24 [ X ] **BY MAIL:** I am readily familiar with the firm’s practice of collection and  
25 processing correspondence by mailing. Under that practice, it would be deposited with the U.S.  
26 Postal Service on that same day with postage fully prepared at Los Angeles, California in the  
27 ordinary course of business. I am aware that on motion of the party served, service is presumed  
28 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