1	21L-011\PDecSCooley211103.plm			
2	ELIZABETH J. GIBBONS, SBN 147033 THE GIBBONS FIRM, P.C.			
3	811 Wilshire Blvd., 17 th Floor Los Angeles, CA 90017			
4	Phone: (323) 591-6000 Email: egibbons@thegibbonsfirm.com			
5		D '		
6	Attorneys for Petitioner, Association of Deputy District Attorneys for Los Angeles County (ADDA)			
7				
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
9	COUNTY OF LOS ANGELES			
10				
11	ASSOCIATION OF DEPUTY DISTRICT) Case No. 2	21STCP03412	
12	ATTORNEYS FOR LOS ANGELES COUNTY (ADDA),		ATION OF STEPHEN L.	
13	Petitioner,) PETITIO	Y IN SUPPORT OF NER'S POINTS AND	
14	v.) RESPON	RITIES IN REPLY TO DENTS' OPPOSITION TO	
15	GEORGE GASCÓN, LOS ANGELES) OSC RE:) INJUNCT	PRELIMINARY ΓΙΟΝ	
16	COUNTY DISTRICT ATTORNEY; LOS ANGELES COUNTY DISTRICT	}	N 1 10 2021	
17	ATTORNEY'S OFFICE; COUNTY OF LOS ANGELES; DOES 1 through 50,) Date:) Time:	November 10, 2021 9:30 a.m.	
18	inclusive,) Place:	Dept. 86	
19	Respondents.			
20				
21				
22				
23				
24				
25				
26				
27				
28				

DECLARATION OF STEPHEN L. COOLEY

- I, Stephen L. Cooley, hereby declare as follows:
- 1. I am not a party to the above entitled action. I make this declaration based upon my own personal knowledge of the facts set forth herein.
- 2. I served as a deputy district attorney ("DDA") from January 1974 to December 2000. During my career in the Los Angeles County District Attorney's Office ("LADA") as a DDA, I served as a DDA Grade I, II, III, IV, and V.
- 3. I was elected Los Angeles County District Attorney ("DA") in November 2000 and served three terms from December 2000 to December 2012.
- 4. During my 12-year tenure as District Attorney, there were no lateral transfers of any deputy public defenders nor alternate public defenders to the position of deputy district attorney.
- 5. The lack of any lateral transfers of deputy public defenders or deputy alternate public defenders into positions of deputy district attorneys during my tenure is because the skill sets for public defenders and alternate public defenders are different than those of prosecutors. They are not similarly situated professionals.
- 6. The only manner in which an employee of the Public Defender's Office or the Alternate Public Defender's Office is able to demonstrate that they possess the skills and aptitudes required to perform the duties of a deputy district attorney, is for them to start in the Office as a new hire, at Grade I, and establish their skills to the satisfaction of their supervisors in the office.
- 7. In order to pass probation and advance to DDA Grade II, all Grade I Deputy District Attorneys are required to pass several weeks of initial training, are subject to strict supervision and monitoring while on probation, and must participate in continuing education specifically designed for a public prosecutor. These requirements are not imposed on Deputy Public Defenders or Alternate Deputy Public Defenders.
- 8. In order to demonstrate their possession of the skills and aptitudes necessary to hold the positions of DDA III or IV, all DDA II's must have at least two

1	years of experience and DDA III's at least four years experience in addition to			
2	successfully passing the promotional examination for each such rank. The years of			
3	experience as a Los Angeles County District Attorney are required prior to promotion in			
4	order to ensure the candidate's familiarity with and adherence to all the policies and			
5	procedures of the Los Angeles County District Attorney's Office.			
6	I declare under penalty of perjury the foregoing is true and correct.			
7	Sworn this 3rd day of November, 2021 at Rolling Hills, California			
8	5 world this 51th day of two verifices, 2021 at Rolling Thins, Camorina			
9	Steve Com			
10	Stephen L. Cooley			
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
ا ۵				

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			
5	not a party to the within action; my business address is 811 Wilshire Boulevard, 17th Floor, Los Angeles, California 90017.			
6	On the date written below, I served the within:			
7 8	DECLARATION OF STEPHEN L. COOLEY IN SUPPORT OF PETITIONER'S POINTS AND AUTHORITIES IN REPLY TO RESPONDENTS' OPPOSITION TO OSC RE: PRELIMINARY			
9 10	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			
11	on the interested parties in said action as follows:			
12	Justin H. Sanders (SBN 211488)			
13	jsanders@sandersroberts.com Sabrina C. Narain (SBN 299471)			
14	snarain@sandersroberts.com Shawn P. Thomas (SBN 302593)			
15	sthomas@sandersroberts.com Matthew D. Barzman (SBN 309063) mbarzman@sandersroberts.com SANDERS ROBERTS LLP 1055 West 7th Street, Suite 3200			
16				
17	Los Angeles, CA 90017			
18	[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			
19	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			
20	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.			
21				
22 23	[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			
24	was reported by the mail administrator. Pursuant to California Rules of Court, Rule 2006(d), I printed the confirmation of the e-mail transmission.			
25	I declare under penalty of perjury that the foregoing is true and correct.			
26	Executed on November 3, 2021 at Los Angeles, California.			
27				
28	Peggy Madsen Peggy Madsen			