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11 *Attorneys for Defendants* CHARLIE BECK and LOS ANGELES POLICE  
12 DEPARTMENT

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15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
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18 JONATHAN BIRDT,  
19 Plaintiff,

20 v.

21 CHARLIE BECK, LEE BACA, THE LOS  
22 ANGELES POLICE DEPARTMENT and  
23 THE LOS ANGELES COUNTY SHERIFFS  
24 DEPARTMENT, DOES 1 to 50, *inclusive*,  
25 Defendants.

CASE NO. CV10-8377 RGK (JEM)

**DECLARATION OF  
ELIZABETH MITCHELL**

**[Defendant's Motion to Stay  
Declaratory Relief Action filed  
concurrently herewith]**

Date: March 14, 2011  
Time: 9:00 a.m.  
Courtroom: 850

26 I, Elizabeth Mitchell, say and declare as follows:

27 1. I am a deputy city attorney and counsel of record for all the Defendants  
28 herein. I am duly admitted to practice before this Court. I make this declaration of my  
own personal knowledge and could and would so testify if called.

2. The City Attorney's Office has been subject to furloughs since July, 2010.  
This requires me to take one (1) day off every two (2) weeks without pay.

3. The City Attorney's Office has had a "hard hiring freeze" in place since  
January, 2009. This means that regardless of the number of attorneys that leave the

1 office, no new attorneys are being hired. Therefore, when an attorney leaves the office,  
2 his or her workload is being distributed amongst the remaining attorneys, resulting in  
3 a significantly higher workload per attorney.

4 4. One attorney left the Police Litigation Section three (3) weeks ago and his  
5 caseload was distributed amongst the remaining attorneys. Amongst others, I was given  
6 a federal trial scheduled for February 22, 2011, for which I am preparing. The Police  
7 Litigation Unit was already understaffed before said attorney left.

8 I swear under penalty of perjury under the laws of the United States that the  
9 foregoing is true and correct. Executed this 12th day of February 2011, at Los Angeles,  
10 California.

11  
12   
13 Elizabeth Mitchell

**PROOF OF SERVICE**

I, RUTH PARKHURST, declare as follows:

At the time of service I was over 18 years of age and not a party to this action. My business address is 200 N. Main Street, 600 City Hall East, Los Angeles, CA 90012, which is the County, City and State where this mailing occurred.

On February 14, 2011 I served the document(s) described as:

**DECLARATION OF ELIZABETH MITCHELL**

on all interested parties in this action:

**Plaintiff in Pro Per**

**Jonathan W. Birdt, Esq.  
18252 Bermuda Street  
Porter Ranch, CA 91326  
(818) 400-4485 & (818) 428-1384 Fax  
Jon@jonbirdt.com**

I served a true copy of the document(s) above by:

Personally delivering it to the person(s) indicated below in the manner provided in FRCivP 5(b).

Depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the address(es) above.

Executed on February 14, 2011, at Los Angeles, California.

I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

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

  
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RUTH PARKHURST

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