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8

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION
12

13 **CHARLES NICHOLS,**

14 Plaintiff,

15 v.

16 **EDMUND G. BROWN JR., in his**
17 **official capacity as Governor of**
18 **California, KAMALA D. HARRIS, in**
19 **her official capacity as Attorney**
20 **General of California, CITY OF**
21 **REDONDO BEACH, CITY OF**
22 **REDONDO BEACH POLICE**
23 **DEPARTMENT, CITY OF**
24 **REDONDO BEACH POLICE**
25 **CHIEF JOSEPH LEONARDI and**
26 **DOES 1 to 10,**

27 Defendants.
28

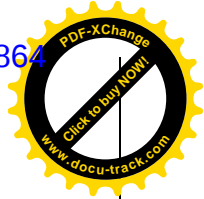
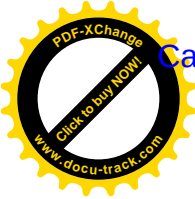
2:11-cv-09916-SJO-(SS)

**NOTICE OF MOTION AND
MOTION FOR JUDGMENT ON
THE PLEADINGS UNDER FED. R.
CIV. P. 12(C)**

Date:	Dec. 17, 2013
Time:	10:00 a.m.
Ctrm.:	23 – 3 rd Flr.
Judge:	Hon. Suzanne H. Segal
Trial Date:	Not Yet Set
Action Filed:	Nov. 30, 2011

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, at 10:00 a.m. on Tuesday, December 17,
2013, or as soon thereafter as the matter may be heard in the above-entitled Court,
located at 312 North Spring St., 3rd Flr., Ctrm. 23, in Los Angeles, Defendant



1 Kamala D. Harris, Attorney General of the State of California (the “Attorney
2 General”), will and hereby does, under Federal Rule of Civil Procedure 12(c), move
3 the Court for judgment on the pleadings in favor of the Attorney General and
4 against Plaintiff Charles Nichols (“Nichols”), because the pleadings fail to state a
5 claim upon which relief can be granted.

6 This motion is based on the instant notice of motion and motion, the
7 accompanying supporting memorandum of points and authorities, the
8 accompanying request for judicial notice, and the pleadings and papers on file in
9 this action.

10 This motion is made following conference of Jonathan M. Eisenberg, counsel
11 of record for the Attorney General, and Nichols, a *pro se* plaintiff, per Local Rule
12 7-3, which conference took place on October 8, 2013.

13 Dated: November 12, 2013

Respectfully submitted,

14 KAMALA D. HARRIS
15 Attorney General of California
16 MARK R. BECKINGTON
Supervising Deputy Attorney General

17
18 /s/ Jonathan M. Eisenberg
JONATHAN M. EISENBERG
19 Deputy Attorney General
20 *Attorneys for Defendant California*
Attorney General Kamala D. Harris