

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

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DISTRICT 2

2014 FEB 14 PM 3:51

JOSEPH A. LANE, CLERK

JOHN RANDO and MARIANO A. RODAS,

Petitioners and Appellants,

vs.

KAMALA HARRIS, individually and in her official
capacity as Attorney General;

Respondent and Appellee,

FRANK QUINTERO, individually and in his official
capacity as Glendale City Councilmember; CITY OF
GLENDALE,

Real Parties in Interest.

Case No. B254060

Los Angeles County Superior Court, Case NO. BS145904
The Honorable James C. Chalfant, Judge

**DECLARATION OF SEAN BRADY IN SUPPORT OF APPELLANTS'
MOTION TO RECONSIDER**

C. D. Michel - S.B.N. 144258
Sean A. Brady - S.B.N. 262007
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Attorneys for Plaintiffs/Appellants

DECLARATION OF SEAN A. BRADY

I, Sean A. Brady, declare as follows:

1. I am an attorney licensed to practice law before the courts of the State of California. I am an associate attorney of the law firm Michel & Associates, P.C., attorneys of record in this action for Appellants, John Rando and Mariano Rodas. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could testify and would testify competently thereto.
2. On February 3, 2014 Appellants filed a motion with this court for Calendar Preference because of the potential for mootness in this matter and due to the important legal issues raised on this appeal.
3. On February 4, 2013, Respondent filed an opposition to Appellants' motion for calendar preference, in which Respondent indicated she would stipulate to a 30 day response time to file her brief.
4. On February 13, 2014 Appellants filed their opening brief in order to bolster their position for calender preference.
5. On February 13, 2014, this Court issued an Order finding Appellants' motion for calendar preference moot.
6. This Court has not set any schedule regarding briefing or a hearing date.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 14th day of February, 2014 at Long Beach, California.

A handwritten signature in black ink, appearing to read 'S. Brady', written over a horizontal line.

Sean A. Brady
Declarant

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

I, Claudia Ayala, am employed in the City of Long Beach, Los Angeles County, California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Blvd., Suite 200 Long Beach, CA 90802.

On February 14, 2014, I served the foregoing document(s) described as

**DECLARATION OF SEAN BRADY IN SUPPORT
OF APPELLANTS' MOTION TO RECONSIDER**

on the interested parties in this action by placing

☐ the original

☒ a true and correct copy

thereof enclosed in sealed envelope(s) addressed as follows:


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X (BY MAIL) As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, 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 is more than one day after date of deposit for mailing an affidavit.

Executed on February 14, 2014, at Long Beach, California.

X (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 14, 2014, at Long Beach, California.



CLAUDIA AYALA

SERVICE LIST

JOHN RANDO ET AL. v. KAMALA HARRIS ET AL.

Mark R. Beclomgton, Supervising Deputy Attorney General Susan K. Smith, Deputy Attorney General Office of the Attorney General 300 S. Spring Street, Suite 1702 Los Angeles, CA 90013 Email: Susan.Smith@doj.ca.gov Attorney for Defendants	Attorney for Defendant Kamala Harris
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Andrew C. Rawcliffe Deputy City Attorney, Litigation Glendale city Attorney's Office 613 E. Broadway, Suite 220 Glendale, CA 91206 Email: ARawcliffe@ci.glendale.ca.us Attorneys for Defendants	Attorney for Defendant/Real Party in Interest Frank Quintero and the City of Glendale
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Honorable James C. Chalfant Los Angeles Superior Court Stanley Mosk Courthouse 111 North Hill Street Los Angeles, CA 90012 Department 85	Judge
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Clerk of the Court Los Angeles Superior Court Stanley Mosk Courthouse 111 North Hill Street Los Angeles, CA 90012	Clerk
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FIRM: MICHEL & ASSOCIATES, P.C.
180 E. OCEAN BLVD.
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LONG BEACH CA 90802
PH: 562/216-4444

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PLAINTIFF: Rando et al COURT: Court of Appeal
VS. JUDICIAL DIST: Second
DEFENDANT: Harris et al CITY: Los Angeles CASE #: B254060

APPROVED DIRECT BILLING:

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ADDRESS:

CITY, STATE, & ZIP:

ADJUSTER:

INSURED:

CLAIM NUMBER:

DATE OF LOSS:

LIST ALL DOCUMENTS:

HEARING
DATE

FEES PAID/
DATE

FEES
ATTACHED

- 1) Motion for Reconsideration
- 2) Declaration of Sean Bradu

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BACK TO COURT ☐

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OKAY ☐

BACK TO COURT ☐

REJECTED ☐

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