

1 C. D. Michel - SBN 144258
Sean A. Brady- SBN 262007
2 **MICHEL & ASSOCIATES, P.C.**
180 East Ocean Blvd., Suite 200
3 Long Beach, CA 90802
Telephone: (562) 216-4444
4 Fax: (562) 216-4445
cmichel@michellawyers.com

5 Attorneys for Plaintiffs/Petitioners
6
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES
10 CENTRAL DISTRICT

11 JOHN RANDO and MARIANO A.
RODAS,

12 Plaintiffs and Petitioners,

13 vs.
14

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

16 Defendant and Respondent,
17

18 FRANK QUINTERO, individually and in
his official capacity as Glendale City
Councilmember; CITY OF GLENDALE,
19

20 Real Parties in Interest.
21
22
23
24
25
26
27
28

CASE NO.

**PLAINTIFFS AND PETITIONERS'
EX PARTE APPLICATION FOR
ALTERNATIVE WRIT OF MANDATE
AND ORDER TO SHOW CAUSE WHY
PEREMPTORY WRIT SHOULD NOT
ISSUE**

Date: November 13, 2013

Time: 8:30 a.m.

Dept. 82, 85, or 86

1 Plaintiffs and Petitioners John Rando and Mariano Rodas (hereafter "Petitioners") hereby
2 apply ex parte for an alternative writ of mandate under the seal of this court and an order to show
3 cause why peremptory writ should not issue. Specifically, Petitioners seeks an alternative writ
4 compelling Defendant and Respondent to grant Petitioners' quo warranto application for leave to
5 sue Real Parties in Interest because Real Party in Interest, Frank Quintero unlawfully holds the
6 public office of Councilmember, and Real Party in Interest, City of Glendale usurped and intruded
7 into that public office by appointing Frank Quintero to the position of councilmember in violation
8 of its City Charter.

9 This application will be based on Petitioners' verified petition, supporting memorandum,
10 notice of writ hearing, and proposed order.

11 Dated: November 8, 2013

MICHEL & ASSOCIATES, P.C.

12
13
14 
15 Sean A. Brady
16 Attorney for Plaintiffs and Petitioners
17
18
19
20
21
22
23
24
25
26
27
28