1 2 3 4 5 6 7 8 9 10	MICHAEL N. FEUER, City Attorney – SBN 111529 JAMES P. CLARK, Chief Deputy City Attorney – SBN 64780 KATHLEEN A. KENEALY, Chief Assistant City Attorney – SBN 212289 SCOTT MARCUS, Civil Litigation Branch Chief – SBN 184980 BLITHE S. BOCK, Assistant City Attorney – SBN 163567 BENJAMIN F. CHAPMAN, Deputy City Attorney – SBN 234436 JONATHAN H. EISENMAN, Deputy City Attorney – SBN 279291 200 North Main Street, 7th Floor, City Hall East Los Angeles, CA 90012 Phone No.: (213) 978-2212 Fax No.: (213) 978-0763 Email: jonathan.eisenman@lacity.org Attorneys for Defendants ERIC GARCETTI, MICHAEL N. FEUER, MICHEL MOORE, and the CITY OF LOS ANGELES IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES			
11	TUDNED'S ODED ATIONS INC(-1			
12	TURNER'S OPERATIONS, INC. et al.,	CASE NO: 20STCP01258		
13	Petitioners & Plaintiffs,	DECLARATION OF JONATHAN H. EISENMAN IN SUPPORT OF DEMURRER TO FIRST AMENDED PETITION FOR		
14	v.	WRIT OF MANDATE AND/OR PROHIBITION OR OTHER		
15 16	ERIC GARCETTI et al.,	APPROPRIATE RELIEF; COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF		
17 18	Respondents & Defendants.	Hearing Date: October 1, 2020 Hearing Time: 1:30 p.m. Department: 82		
19		FEE EXEMPT (GOV. CODE, § 6103)		
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	DECLARATION OF JONATHAN H. EISENMAN			

DECLARATION	OF JONATHAN	H. EISENMAN
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Jonathan H. Eisenman declares:

 I am licensed to practice law in the State of California and am a deputy city attorney for the City of Los Angeles. I serve in this matter as an attorney for Mayor Eric Garcetti, City Attorney Michael N. Feuer, Los Angeles Police Department Chief of Police Michel Moore, and the City of Los Angeles. I could testify truthfully to the following facts, of which I have personal knowledge.
On Wednesday, May 13 at 4:00 p.m. and pursuant to Code of Civil Procedure

section 430.41, I met and conferred telephonically with Sean Brady, counsel for the petitioners in this matter. Having informed Mr. Brady of several problems with the causes of action that are the subject of the instant demurrer, Mr. Brady indicated that he would not abandon them voluntarily.

I declare under penalty of perjury according to the laws of the State of California that the foregoing is true and correct.

Executed on May 22, 2020 at Los Angeles, California.

/s/ Jonathan H. Eisenman Jonathan H. Eisenman

1	PROOF OF SERVICE			
2		<u>Turner Operations, Inc. et al. v. Eric Garcetti, et al.</u> LASC Case No. 20STCP01258		
3	withi	I, Maria Cruz, the undersigned, say: I am over the age of 18 years and not a party to the		
4	within action or proceeding. My business address is 200 North Main Street, City Hall East, 7th Floor, Los Angeles, California 90012.			
5	On May 22, 2020, I served the foregoing documents described as: DECLARATION OF JONATHAN H. EISENMAN IN SUPPORT OF DEMURRER TO FIRST AMENDED PETITION FOR WRIT OF MANDATE AND/OR PROHIBITION OR OTHER APPROPRIATE RELIEF; COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF on the interested parties:			
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7				
8	C.D.	Michel		
9	Sean A. Brady Matthew D. Cubeiro			
10	MICHEL & ASSOCIATES, P.C. 180 E. Ocean Blvd., Suite 200			
11	Long Beach, CA 90802 Email: <u>cmichel@michellawyers.com</u>			
12	Email: sbrady@michellawyers.com			
13	[]	BY MAIL – I am readily familiar with the practice of the Los Angeles City Attorney's Office for collection and processing of correspondence for mailing with the United States		
14		Postal Service. In the ordinary course of business, correspondence is deposited with the		
15 16		United States Postal Service the same day it is placed for collection and mailing. On the date referenced above, I placed a true copy of the above documents(s) in a sealed envelope and placed it for collection in the proper place in our office at Los Angeles, California.		
17 18	[X]	BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address maria.cruz@lacity.org to the persons at the email addresses listed in the Service List		
19	[]	BY PERSONAL SERVICE: I placed a true copy of the above document(s) in a sealed		
20 21		envelope for delivery via messenger by Los Angeles City Attorney's Document Services, 200 No. Main Street, 8 th Floor, City Hall East, Los Angeles, CA 90012.		
	[]	BY OVERNIGHT DELIVERY : I served the documents by placing them in an envelope		
22 23		or package addressed to the persons listed above and providing them to UPS Courier for		
23		delivery.		
24	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.			
26				
27	<u>/s/ Maria Cruz</u>			
28				
		PROOF OF SERVICE		
		I ROOF OF SERVICE		