

1 C.D. Michel – SBN 144258  
Sean A. Brady – SBN 262007  
2 Tiffany D. Chevront – SBN 317144  
MICHEL & ASSOCIATES, P.C.  
3 180 East Ocean Blvd., Suite 200  
Long Beach, CA 90802  
4 Telephone: (562) 216-4444  
Facsimile: (562) 216-4445  
5 Email: cmichel@michellawyers.com

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Superior Court of California,  
County of Los Angeles  
3/18/2026 5:29 PM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By A. Simmons, Deputy Clerk

6 Attorneys for Petitioners Safari Club International;  
California Rifle & Pistol Association, Incorporated;  
7 California Bowmen Hunters/State Archery Association;  
HOWL for Wildlife, Inc.; California Deer Association;  
8 and Coalition to Save Catalina Island Deer

9  
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES**

12 SAFARI CLUB INTERNATIONAL;  
CALIFORNIA RIFLE & PISTOL  
13 ASSOCIATION, INCORPORATED;  
CALIFORNIA BOWMEN  
HUNTERS/STATE ARCHERY  
14 ASSOCIATION; HOWL FOR WILDLIFE,  
INC.; CALIFORNIA DEER  
15 ASSOCIATION; and COALITION TO  
SAVE CATALINA ISLAND DEER,

16 Plaintiffs-Petitioners,

17 v.

18 CALIFORNIA DEPARTMENT OF FISH  
AND WILDLIFE; CALIFORNIA  
19 DEPARTMENT OF FISH AND  
WILDLIFE, SOUTH COAST REGION;  
20 and DOES 1-10,

21 Defendants-Respondents.

22 CATALINA ISLAND CONSERVANCY,

23 Real Party in Interest.  
24

Case No.: 26STCP00987

**DECLARATION OF SEAN A. BRADY IN  
SUPPORT OF PETITIONERS' NOTICE OF  
MOTION AND MOTION TO CONFORM  
FILING DATE TO ATTEMPTED  
TRANSMISSION DATE OR OTHER  
APPROPRIATE RELIEF**

Hearing Date: May 28, 2026  
Hearing Time: 1:30 PM  
Department: 86  
Judge: Hon. Curtis A. Kin

1 **DECLARATION OF SEAN A. BRADY**

2 I, Sean Brady, hereby declare as follows:

3 1. I am a member of the bar of the State of California. I am an attorney at law duly licensed  
4 to practice in the State of California and before this court. I am counsel of record for the Petitioners  
5 Safari Club International, California Rifle & Pistol Association, Incorporated, California Bowmen  
6 Hunters/State Archery Association, HOWL for Wildlife, Inc., California Deer Association, and  
7 Coalition to Save Catalina Island Deer (“Petitioners”) in the above-captioned matter. I submit this  
8 declaration in support of Petitioners’ Verified Petition for Writ of Mandate or Other Appropriate Relief  
9 (hereinafter the “Petition”) and as a request for relief from late filing due to transmission failures with  
10 the online platform under Los Angeles Superior Court, First Amended General Order, 7 (a)(ii), May 3,  
11 2019, and the rules of court. I have personal knowledge of the facts stated below and of the proceedings  
12 in this matter. If I were to be called as a witness, I could and would competently testify under oath as to  
13 the matters I have set forth below.

14 2. This matter involves a challenge to the decision by the Department of Fish Wildlife and  
15 its South Coast Region to exempt from CEQA review issuance of a restoration management permit to  
16 the Catalina Island Conservancy for a sweeping project on Catalina Island, which includes the  
17 eradication of all mule deer on the island via use of helicopters, drones, netting, baiting, and shooting  
18 with firearms and air-guns. The Department published its Notice of Exemption for the project on  
19 February 2, 2026. Under Title 14 of the Code of Regulations (CEQA Guidelines) section 15062(d),  
20 Petitioners had 35 days from February 2, 2026, to file a challenge, making the deadline March 9, 2026.

21 3. Petitioners have retained Michel & Associates, PC (“the Firm”) to represent them in  
22 preparing, filing, and litigating their challenge to the Department’s granting of a CEQA exemption for  
23 the Catalina project. The Firm assigned this matter to its primary paralegal for assisting counsel in  
24 preparing and filing the Petition. Over the weeks of assisting counsel in preparing the Petition, the  
25 Firm’s primary paralegal became familiar with the nature of this matter, the parties involved, what  
26 filings the Petition would include, and related deadlines.

27 4. On the morning of March 9, 2026, I provided the Firm’s primary paralegal final  
28 instructions for preparing the Petition for filing, including an exhibit list and verifications to be finalized.

1 She was in regular communication with me about preparing those documents throughout the day and  
2 understood what needed to be done.

3 5. At around 3:30 PM on March 9, 2026, the Firm's lead paralegal informed me that she had  
4 an unexpected medical emergency and was forced to abandon her work on preparing the filing without  
5 having finished it. Her sudden and unexpected departure required the Firm to quickly find another  
6 person at the Firm to take over. Ms. Haydee Villegas, the Firm's Finance Manager, was available, able,  
7 and willing to assist, beginning around 4:00 PM on March 9, 2026, but was unavailable between about  
8 4:30 PM and 6:30 PM because she had a previous commitment with her children during that time, which  
9 she communicated to counsel. She began working in earnest on the filing around 6:30 PM.

10 6. Ms. Villegas is familiar with the process of legal filings generally, but she does not  
11 usually perform legal filing for the Firm. Ms. Villegas was wholly unfamiliar with the nature of this  
12 matter, including the specific filing instructions and documents associated with the filing. As a result,  
13 Ms. Villegas had to spend time learning and understanding what documents to prepare for the filing, all  
14 the filing instructions, and where the Firm's lead paralegal had left off in that process before her  
15 emergency departure.

16 7. Ms. Villegas maintained regular communication with counsel for the Firm, including  
17 myself, while she worked on determining what needed to be done to complete the filing, exchanging  
18 various messages and calls. Counsel for the Firm had reviewed the documents that Ms. Villegas had  
19 compiled for the Petition and the finalized Petition itself and authorized Ms. Villegas to proceed with  
20 preparing them for filing at around 10:40 PM. Ms. Villegas immediately worked to merge the  
21 documents into a single filing. Once finished, she requested final confirmation of the case details to be  
22 entered into the One Legal system and the finalization of the Civil Case Cover Sheet for the matter.

23 8. As explained by Ms. Villegas in her concurrently filed declaration, she began trying to  
24 file the Petition and related documents at around 11:18 PM on March 9, 2026. (See Declaration of  
25 Haydee Villegas in Support of Petitioners' Notice of Motion and Motion to Conform Filing Date to  
26 Attempted Transmission Date or Other Appropriate Relief, ¶ 8.) The electronic filing system would not  
27 allow uploading the Petition and supporting documents, despite numerous attempts, and the system  
28 crashed while those documents were being uploaded. (*Id.* at ¶¶ 8-10.)

1           9.       Ms. Villegas immediately informed me of the issues she was having with the electronic  
2 filing system not accepting the filing. Once she confirmed that the electronic system would not accept  
3 the filing after multiple attempts, I instructed her to upload the Petition only (the main document)  
4 without the exhibits attached to see if that would work, and we would contact the court regarding the  
5 exhibits later. Ms. Villegas was finally able to get the Petition (without the supporting documents)  
6 uploaded and confirmed at 12:18 AM on March 10, 2026.

7           10.       This Court accepted Petitioners' filing on March 11, 2026, which is stamped as having  
8 been received on March 10, 2026.

9           11.       Counsel at the Firm immediately reached out to the Court's Clerk about the process for  
10 alerting the Court to the issues the Firm encountered with the electronic filing process under Los  
11 Angeles Superior Court, First Amended General Order, § 7 (a)(ii)(2) (May 3, 2019). The Clerk informed  
12 the Firm that it would need to file a motion seeking relief under that order once a judge is assigned. On  
13 March 18, 2026, the Firm was informed by the Court that the Honorable Curtis A. Kin had been  
14 assigned as judge for further proceedings in this matter. The Firm brings the present motion on the  
15 Petitioners' behalf the same day.

16           12.       The filing that has been accepted by this Court on March 11, 2026, is the same document  
17 in every respect as to what the Firm's legal assistant attempted to file on March 9, 2026, but was unable  
18 to file until minutes after midnight on March 10, 2026. The firm has made no changes to any document  
19 associated with the filed Petition since March 9, 2026, including the exhibits thereto that the electronic  
20 filing system rejected, which the Firm is currently working with this Court to file properly.

21  
22           I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of  
23 March 2026, in Huntington Beach, California.

24  
25  
26 

27 Sean Brady  
28 Declarant