

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

Electronically FILED by
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
23 CATALINA ISLAND CONSERVANCY,

24 Real Party in Interest.
25
26
27
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Case No.: 26STCP00987

**PETITIONERS' NOTICE OF MOTION AND
MOTION TO CONFORM FILING DATE TO
ATTEMPTED TRANSMISSION DATE OR
OTHER APPROPRIATE RELIEF**

[In re L.A. Super. Ct. – Mandatory Electronic Filing
for Civil, First Amended Gen. Order (May 3, 2019)]

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

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE, that on May 28, 2026 at 1:30 PM, in Department 86 of the above-
3 captioned Court located at 111 North Hill Street, Los Angeles, California, 90012, the Motion of
4 Petitioners Safari Club International, California Rifle & Pistol Association, Incorporated, California
5 Bowmen Hunters/State Archery Association, HOWL for Wildlife, Inc., California Deer Association, and
6 Coalition to Save Catalina Island Deer regarding late filing due to technical difficulties and request that
7 this Court deem writ filing date conforms to attempted transmission date came for hearing.

8 This Motion is based on this Notice, the attached Memorandum of Points and Authorities, the
9 Declarations of Sean A. Brady and Haydee Villegas, all pleadings and papers on file in this action, and
10 any further arguments the Court may permit.

11 Dated: March 18, 2026

MICHEL & ASSOCIATES, P.C.



14 Sean A. Brady
15 Attorneys for Petitioners Safari Club International;
16 California Rifle & Pistol Association, Incorporated;
17 California Bowmen Hunters and State Archery
18 Association; HOWL for Wildlife, Inc.; California
19 Deer Association; and Coalition to Save Catalina
20 Island Deer

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 COME NOW, Petitioners Safari Club International, California Rifle & Pistol Association,
3 Incorporated, California Bowmen Hunters/State Archery Association, HOWL for Wildlife, Inc.,
4 California Deer Association, and Coalition to Save Catalina Island Deer to request that their Verified
5 Petition for Writ of Mandate or Other Appropriate Relief (the “Writ”) in the above-captioned matter be
6 deemed filed on March 9, 2026, to conform to the date that Petitioners unsuccessfully attempted
7 transmission of their Writ, due to the electronic filing system preventing transmission, which was not the
8 fault of Petitioners.

9 On May 3, 2019, the Superior Court of Los Angeles County issued First Amended General
10 Order In re Los Angeles Superior Court – Mandatory Electronic Filing for Civil. (First Am. Gen. Order,
11 (May 3, 2019) <[https://lascpubstorage.blob.core.windows.net/cpw/LIBOPSCivil-36-](https://lascpubstorage.blob.core.windows.net/cpw/LIBOPSCivil-36-1stAmendedGeneralOrderMandatoryEfilingCivil.pdf)
12 [1stAmendedGeneralOrderMandatoryEfilingCivil.pdf](https://lascpubstorage.blob.core.windows.net/cpw/LIBOPSCivil-36-1stAmendedGeneralOrderMandatoryEfilingCivil.pdf)> [as of Mar. 18, 2026].) That order requires that
13 all documents filed in Non-Complex Unlimited Civil cases by litigants represented by attorneys be filed
14 electronically and details the required procedures for doing so. It also provides that “[n]otwithstanding
15 any other provision of this order, if a digital document is not filed in due course because of: . . . a
16 transmission error that is not the fault of the transmitter . . . , the Court may order, either on its own
17 motion or by noticed motion submitted with a declaration for Court consideration, that the document be
18 deemed filed and/or that the document’s filing date conform to the attempted transmission date.” (*Id.* at
19 p. 5:20-25.) Petitioners bring this motion asking that the Court deem their Writ filed on March 9, 2026,
20 to conform to the date that Petitioners unsuccessfully attempted their transmission, due to the electronic
21 filing system preventing transmission, not the fault of Petitioners.

22 This is a public interest matter challenging the decision by the Department of Fish Wildlife and
23 its South Coast Region to exempt from CEQA review the issuance of a restoration management permit
24 to the Catalina Island Conservancy for a sweeping project on Catalina Island, which includes the
25 eradication of all mule deer on the island via use of helicopters, drones, netting, baiting, and shooting
26 with firearms and air-guns. (Declaration of Sean A. Brady in Support of Petitioners’ Notice of Motion
27 and Motion to Conform Filing Date to Attempted Transmission Date or Other Appropriate Relief
28 (“Brady Decl.”), ¶ 2.) The Department published its Notice of Exemption from CEQA for the project on

1 February 2, 2026. (*Ibid.*) Under Title 14 of the Code of Regulations (CEQA Guidelines) section 15062,
2 subdivision (d), Petitioners had 35 days from February 2, 2026, to file a challenge, making the deadline
3 March 9, 2026. (*Ibid.*)

4 Petitioners' counsel attempted to file their Writ in this matter via the court-approved Electronic
5 Filing Service Provider, One Legal, on March 9, 2026, but were prevented from timely completing
6 transmission due to technical issues with the online filing system that were beyond their control.
7 Specifically, counsel's legal assistant, Ms. Haydee Villegas, attempted to upload the filing at 11:18 PM
8 on March 9, 2026, but while doing so, the upload was slow and the One Legal system abruptly logged
9 her out in the middle of the process, terminating the filing session that she had spent time preparing for
10 upload. (Declaration of Haydee Villegas in Support of Petitioners' Notice of Motion and Motion to
11 Conform Filing Date to Attempted Transmission Date or Other Appropriate Relief ("Villegas Decl."),
12 ¶ 8 [attaching time-stamped documentation of her efforts as exhibits thereto].)

13 Ms. Villegas immediately communicated the problems that she was encountering with the filing
14 system to Petitioners' counsel. (Brady Decl., ¶ 9; Villegas Decl., ¶ 9.) Because of those issues, and with
15 little time left before the midnight filing deadline, Petitioners' counsel instructed Ms. Villegas to keep
16 trying, but if the problem persisted, to try to file the Petition alone without the exhibits attached in case
17 they were the problem, and that counsel would work to get the supporting documents to the Court with
18 its guidance. (Brady Decl., ¶ 9; Villegas Decl., ¶ 9.) Ms. Villegas immediately attempted to log back into
19 the electronic filing system to complete the filing, but was prompted to start the filing over completely,
20 including re-entering all case information. (Villegas Decl., ¶ 10.) Once that was completed, she
21 attempted to upload the filing again, but the system still would not accept it. (*Ibid.*) Based on her belief
22 and counsel's suggestion that the exhibits attached to the Petition could be the source of the problem,
23 she removed them and was finally able to get the Petition (without exhibits) uploaded and confirmed
24 filed at 12:18 AM on March 10, 2026. (Brady Decl., ¶ 9; Villegas Decl., ¶ 11.)

25 While Petitioners' attempted filing occurred shortly before the deadline, leaving little time to
26 respond to issues like the sort they encountered, that was not a result of them waiting until the last
27 minute to prepare the filing. There was a medical emergency involving critical staff assigned to handle
28 the filing, which caused unforeseen delays in preparing it. Petitioners' counsel assigned this matter to

1 their primary paralegal to assist counsel in preparing and filing the Petition. (Brady Decl., ¶ 3; Villegas
2 Decl., ¶ 3.) Over the weeks of assisting counsel in preparing the Writ, the Firm’s primary paralegal
3 became familiar with the nature of this matter, the parties involved, what filings the Writ would include,
4 and related deadlines. (Brady Decl., ¶ 3.)

5 On the morning of March 9, 2026, Petitioners’ counsel provided their primary paralegal with
6 final instructions for preparing the Writ for filing, including a final exhibit list and verifications to be
7 finalized. (Brady Decl., ¶ 4.) The Firm’s lead paralegal was in regular communication with Petitioners’
8 counsel throughout the day to prepare those documents and understood what needed to be done. (*Ibid.*)
9 At around 3:30 PM on March 9, 2026, however, the lead paralegal informed Petitioners’ counsel that
10 she had an unexpected medical emergency and was forced to abandon her work on preparing the filing
11 without having finished it. (Brady Decl., ¶ 5; Villegas Decl., ¶ 4.) Her sudden and unexpected departure
12 required Petitioners’ counsel to quickly find another person to take over, and that person turned out to be
13 Ms. Villegas. (Brady Decl., ¶ 5; Villegas Decl., ¶ 5.) While experienced with filings generally, Ms.
14 Villegas does not usually handle legal filings and was wholly unfamiliar with the nature of this matter,
15 including the specific filing instructions and documents associated with the filing. (Brady Decl., ¶ 6;
16 Villegas Decl., ¶ 5.) As a result, Ms. Villegas had to spend time learning and understanding what
17 documents to prepare for the filing, all the filing instructions, and where the lead paralegal had left off in
18 that process before her emergency departure. (Brady Decl., ¶ 6; Villegas Decl., ¶ 6.) This took significant
19 time, with little time to spare, and was further limited by Ms. Villegas having to attend an appointment
20 with her children before she could work exclusively on the filing. (Villegas Decl., ¶¶ 6-7.)

21 Petitioners’ counsel immediately reached out to the Court’s Clerk about the process for alerting
22 the Court to the issues encountered with the electronic filing process under First Amended General
23 Order In re Los Angeles Superior Court – Mandatory Electronic Filing for Civil. (Brady Decl., ¶ 11.)
24 The Court Clerk informed the Firm that it would need to file its motion seeking relief under that order
25 once a judge is assigned. (*Ibid.*) On March 18, 2026, the Firm was informed by the Court that the
26 Honorable Curtis A. Kin had been assigned as judge for further proceedings in this matter. (*Ibid.*) The
27 Firm brings the present motion on the Petitioners’ behalf the same day. (*Ibid.*)
28

1 In sum, an unforeseeable medical emergency for critical staff delayed Petitioners' counsel in
2 preparing the Writ for filing, and despite the alternate legal assistant who took over without knowing
3 anything about the matter overcoming that dilemma in relatively short order by preparing the filing and
4 attempting to file it before the deadline, the online filing system precluded timely transmission.
5 Petitioners' access to the Court to hear this matter of patently supreme public interest should not be
6 permanently foreclosed due to a technology issue out of their control that resulted in their Writ being
7 filed just 18 minutes after the deadline, particularly when they were delayed in attempting to file by an
8 unforeseeable medical emergency of the primary individual tasked with preparing the filing.

9 Petitioners thus respectfully request that this Court order that Petitioners' Writ be deemed filed
10 on the date of its attempted transmission, March 9, 2026, or grant any other relief available to allow
11 Petitioners' case to move forward.

12
13 Dated: March 18, 2026

MICHEL & ASSOCIATES, P.C.



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15 Sean A. Brady
16 Attorneys for Petitioners Safari Club International;
17 California Rifle & Pistol Association, Incorporated;
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