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Superior Court of California,
County of Los Angeles
5/29/2026 8:41 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Bolden, 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;
13 CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED;
14 CALIFORNIA BOWMEN
HUNTERS/STATE ARCHERY
ASSOCIATION; HOWL FOR WILDLIFE,
15 INC.; CALIFORNIA DEER
ASSOCIATION; and COALITION TO
16 SAVE CATALINA ISLAND DEER,

17 Plaintiffs-Petitioners,

18 v.

19 CALIFORNIA DEPARTMENT OF FISH
AND WILDLIFE; et al.,

20 Defendants-Respondents.
21

Case No.: 26STCP00987

**NOTICE OF FILING FIRST AMENDED
COMPLAINT & PETITION FOR WRIT OF
MANDATE**

22
23 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

24 PLEASE TAKE NOTICE that Petitioners Safari Club International, California Rifle & Pistol
25 Association, Incorporated, California Bowmen Hunters/State Archery Association, HOWL for Wildlife,
26 Inc., California Deer Association, and Coalition to Save Catalina Island Deer, pursuant to California
27 Code of Civil Procedure section 472, filed their First Amended Complaint and Petition for Writ of
28 Mandate or Other Appropriate Relief (the “First Amended Petition”) in this action on May 27, 2026,

1 which filing moots the demurrers filed by Respondent California Department of Fish & Wildlife
2 (Respondent's Demurrer to Pet. for Writ of Mandate (May 15, 2026)) and Real Party in Interest Catalina
3 Island Conservancy (Real Party in Interest Catalina Island Conservancy's Demurrer (May 15, 2026))

4 California Code of Civil Procedure section 472 allows

5 a party to amend its pleading once without leave of the court at any time before
6 the answer, demurrer, or motion to strike is filed, or after a demurrer or motion to
7 strike is filed but before the demurrer or motion to strike is heard, if the amended
8 pleading is filed and served no later than the date for filing an opposition to the
9 demurrer or motion to strike.”


10 (Cal Civ. Proc. Code § 472(a).).

11 Respondent and Real Party in Interest filed their demurrers on May 15, 2026. Petitioners'
12 opposition to those demurrers was due on May 29, 2026. Because Petitioners filed their First Amended
13 Petition prior to the date their opposition to the demurrers was due, an exercise of their statutory right to
14 amend their pleading under Section 472, the First Amended Petition supersedes the previously filed
15 Petition and is now the operative pleading in this action, making both Respondent's and Real Party in
16 Interest's demurrers moot.

17 Petitioners filed their First Amended Petition in good faith to clarify and further allege facts and
18 claims relating to Respondent's approval and implementation of the challenged Project, including but
19 not limited to allegations concerning statutory authority, compliance with Public Resources Code
20 section 21080.56, the applicability of the SERP exemption, public trust obligations under Fish and
21 Game Code sections 711.7, 1600-1616, public nuisance claims under Civ. Code sections 1060, 3491,
22 3493, 3495, 3479-3480, ultra vires agency action and unauthorized treatment of wildlife as invasive
23 species, and related procedural and substantive violations.

24 Dated: May 29, 2026

25 **MICHEL & ASSOCIATES, P.C.**

26 

27 C.D. Michel
28 Attorneys for Petitioners Safari Club International;
California Rifle & Pistol Association, Incorporated;
California Bowmen Hunters and State Archery
Association; HOWL for Wildlife, Inc.; California
Deer Association; and Coalition to Save Catalina
Island Deer

PROOF OF SERVICE

1 STATE OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3 I, Laura Fera, am employed in the City of Long Beach, Los Angeles County, California. I am
4 over the age eighteen (18) years and am not a party to the within action. My business address is 180
5 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

6 On May 29, 2026, I served the foregoing document(s) described as

**NOTICE OF FILING FIRST AMENDED COMPLAINT & PETITION FOR WRIT OF
MANDATE**

7 on the interested parties in this action by placing

8 [] the original

[X] a true and correct copy

9 thereof by the following means, addressed as follows:

10 Evan Eickmeyer
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15 *Attorneys for Respondent California*
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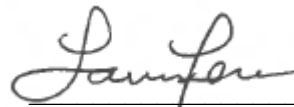
Attorneys for Respondent Catalina Island
Conservancy

17 (**BY MAIL**) As follows: I am “readily familiar” with the firm’s practice of collection and
18 processing correspondence for mailing. Under the practice it would be deposited with the U.S.
19 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.

20 (**BY ELECTRONIC MAIL**) As follows: I served a true and correct copy by electronic
21 transmission pursuant to CCP 1010.6. Said transmission was reported and completed without
error.

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

24 Executed May 29, 2026, at Long Beach, California.

25 

26 Laura Fera