

SUPREME COURT COPY

**SUPREME COURT
FILED**

OCT 14 2015

**IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA**

Frank A. McGuire Clerk
Deputy

926 NORTH ARDMORE AVENUE, LLC,)

Plaintiff and Appellant,

vs.

COUNTY OF LOS ANGELES,

Defendant and Respondent.

Supreme Court Case No. **S222329**

) Court of Appeal, Second District

) Case No. B248356

) Los Angeles County Superior Court

) Case No. BC476670

**AMICUS CURIA CITY OF LOS ANGELES' JOINDER IN BRIEF OF AMICI
CURIAE COUNTY OF TEHAMA and TEHAMA COUNTY CLERK-RECORDER
JENNIFER A. VISE, et al.**

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Attorneys for Amici Curiae
CITY OF LOS ANGELES

JOINDER IN BRIEF OF AMICI CURIAE

The City of Los Angeles hereby joins in the Brief of Amici Curia by County of Tehama, *et al.*, without reservation. The City agrees with the analysis and conclusions set forth in the afore-mentioned pleading.

DATE: October 1, 2015

MICHAEL N. FEUER, City Attorney
BEVERLY A. COOK, Assistant City
Attorney
DANIEL M. WHITLEY, Deputy City
Attorney

By: 

DANIEL M. WHITLEY, Deputy City
Attorney

Attorneys for Plaintiff
CITY OF LOS ANGELES


CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

Amicus curia the City of Los Angeles, to the best of its knowledge, is unaware of any entities or persons who have a financial or other interest in the outcome of this proceeding that would be relevant to California Rule of Court 8.208.

DATE: October 1, 2015

MICHAEL N. FEUER, City Attorney
BEVERLY A. COOK, Assistant City
Attorney
DANIEL M. WHITLEY, Deputy City
Attorney

By:


DANIEL M. WHITLEY, Deputy City
Attorney

Attorneys for Plaintiff
CITY OF LOS ANGELES

CERTIFICATION OF COMPLIANCE WITH WORD LIMIT

Pursuant to California Rule of Court 8.204(c)(1), I certify that this Brief contains 366 words, not counting the tables, and this attachment, as determined by the word count function of Microsoft Office Word.

DATE: October 1, 2015

MICHAEL N. FEUER, City Attorney
BEVERLY A. COOK, Assistant City
Attorney
DANIEL M. WHITLEY, Deputy City
Attorney

By: 

DANIEL M. WHITLEY, Deputy City
Attorney

Attorneys for Plaintiff
CITY OF LOS ANGELES

CERTIFICATE OF SERVICE

Title of Action: 926 North Ardmore Avenue, LLC
Supreme Court Case No. S222329

I, the undersigned, am employed in the City of Red Bluff, County of Tehama, State of California; my business address is 727 Oak Street, Red Bluff, CA 96080. I am over the age of eighteen years and not a party to the within action. On the date below I caused the following papers to be served as follows:

[PROPOSED] BRIEF OF AMICI CURIAE OF COUNTY OF TEHAMA and TEHAMA COUNTY CLERK-RECORDER JENNIFER A. VISE; COUNTY OF ALAMEDA; COUNTY OF FRESNO and FRESNO COUNTY ASSESSOR-RECORDER PAUL DICTOS; KERN COUNTY ASSESSOR-RECORDER JON LIFQUIST; COUNTY OF MONO; COUNTY OF MONTEREY and MONTEREY COUNTY ASSESSOR-CLERK-RECORDER STEPHEN L. VAGNINI; NAPA COUNTY and NAPA COUNTY ASSESSOR-RECORDER-COUNTY CLERK JOHN TUTEUR; COUNTY OF PLACER and PLACER COUNTY CLERK-RECORDER-REGISTRAR JIM MCCAULEY; COUNTY OF RIVERSIDE and RIVERSIDE COUNTY ASSESSOR PETER ALDANA; COUNTY OF SAN BENITO and SAN BENITO COUNTY CLERK, AUDITOR & RECORDER JOE PAUL GONZALEZ; COUNTY OF SAN DIEGO and SAN DIEGO COUNTY ASSESSOR/RECORDER/COUNTY CLERK ERNEST J. DRONENBURG, JR.; COUNTY OF SAN MATEO; COUNTY OF SANTA BARBARA and SANTA BARBARA COUNTY ASSESSOR JOSEPH E. HOLLAND; COUNTY OF SONOMA and SONOMA COUNTY CLERK-RECORDER-ASSESSOR WILLIAM F. ROUSSEAU; and COUNTY OF STANISLAUS

Causing a true copy thereof to be delivered to the office of each party shown below at the address indicated and by leaving the same with a person apparently in charge and over the age of eighteen years;

(X) Placing a true copy thereof, enclosed in a sealed envelope with first-class postage thereon fully prepaid, in the United States mail at Red Bluff, California, addressed as follows:

Clerk of the Appellate Court
Second District Court
300 S. Springs Street, 2nd floor
Los Angeles, CA 90013

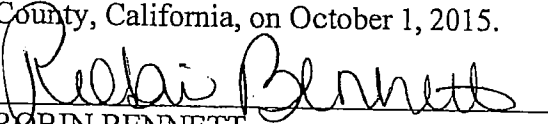
Hon. Rita Miller
Los Angeles Superior Court
Dept. 16
111 North Hill Street
Los Angeles, CA 90012

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Daniel M. Kolkey
Julian W. Poon
Lauren M. Blas
GIBSON DUNN & CRUTCHER
555 Mission Street, Suite 3000
San Francisco, CA 94105-2933

I declare under penalty of perjury that the foregoing is true and correct, executed at Tehama County, California, on October 1, 2015.


ROBIN BENNETT

PROOF OF SERVICE

I, Cynthia Marchena, declare as follows: I am employed in the County of Los Angeles, California. I am over the age of 18 and not a party to the within action. My business address is 200 N. Main St., Rm. 920 C.H.E., and Los Angeles, California 90012.

On October 2, 2015, I served the foregoing document described as **JOINDER IN BRIEF OF AMICI CURIAE**, on the interested parties in this action by placing a true copy original copy thereof enclosed in a sealed envelope addressed as follows:

Clerk of The Appellate Court
Second District Court
300 S. Spring Street, 2nd floor
Los Angeles, CA 90013

Hon. Rita Miller
Los Angeles Superior Court
111 North Hill Street, Dept. 16
Los Angeles, CA 90012

Lemoine Skinner III
Fisher Broyles LLP
1334 8th Avenue
San Francisco, CA 94122

Mark J. Saladino, County Counsel
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Los Angeles, CA 90012-2713

Daniel M. Kolkey
Julian W. Poon
Lauren M. Blas
GIBSON DUNN & CRUTCHER
555 Mission Street, Suite 3000
San Francisco, CA 94105-2933


MAIL - I caused such envelope to be deposited in the United States mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business. I caused such envelope to be deposited in the mail at Los Angeles, California, with first class postage thereon fully prepaid.

BY FACSIMILE - I caused the above-referenced document(s) to be transmitted to the above-named person(s).

Federal - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

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

Executed on October 2, 2015, at Los Angeles, California.



Cynthia Marchena