

1 DIANE F. BOYER-VINE (SBN: 124182)  
Legislative Counsel  
2 ROBERT A. PRATT (SBN: 137704)  
Principal Deputy Legislative Counsel  
3 CARA L. JENKINS (SBN: 271432)  
4 Deputy Legislative Counsel  
Office of Legislative Counsel  
5 925 L Street, Suite 700  
6 Sacramento, California 95814  
Telephone: (916) 341-8245  
7 E-mail: cara.jenkins@lc.ca.gov

8 Attorneys for Legislative Defendants  
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10 UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 WESTERN DIVISION  
13

14  
15 Travis Middleton, et al.,  
16 Plaintiffs,  
17  
18 v.  
19 Richard Pan, et al.,  
20 Defendants.  
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Case No. 2:16-cv-05224-SVW-AGR

**NOTICE OF JOINDER AND  
JOINDER IN REPLY TO  
PLAINTIFFS' REFUSAL FOR  
FRAUD DIRECTED TO THE  
MAGISTRATE JUDGE'S REPORT  
AND RECOMMENDATION FILED  
BY DEFENDANTS STATE OF  
CALIFORNIA, GOVERNOR  
BROWN, AND ANNE GUST**

22 Date: December 13, 2016  
23 Courtroom: B  
24 Judge: Hon. Alicia G. Rosenberg,  
Magistrate Judge  
25 Trial date: None set  
26 Action filed: July 15, 2016  
27  
28

1 TO THE COURT AND ALL PARTIES HEREIN:

2 PLEASE TAKE NOTICE THAT Defendants Assembly Member Catharine  
3 Baker, Assembly Member Richard Bloom, Assembly Member David Chiu, Assembly  
4 Member Jim Cooper, Assembly Member Cristina Garcia (erroneously sued as  
5 Christina Garcia), Assembly Member Lorena Gonzalez, Assembly Member Reginald  
6 Jones-Sawyer, Assembly Member Evan Low, Assembly Member Adrin Nazarian,  
7 Assembly Member Bill Quirk, Assembly Member Anthony Rendon, Assembly  
8 Member Mark Stone, Assembly Member Jim Wood, Senator Ben Allen, Senator Jim  
9 Beall, Senator Marty Block, Senator Kevin de Leon, Senator Robert Hertzberg,  
10 Senator Mark Leno, Senator Isadore Hall, Senator Jerry Hill, Senator Hannah-Beth  
11 Jackson, Senator Mike McGuire, Senator Holly Mitchell, Senator Richard Pan,  
12 Senator Jeff Stone, Senator Bob Wieckowski, Senator Lois Wolk, Wen-Li Wang  
13 (erroneously sued as Win-Li Wang), and Bruce Wolk (collectively “Legislative  
14 Defendants”) hereby join in the Reply to Plaintiffs’ Refusal for Fraud Directed to the  
15 Magistrate Judge’s Report and Recommendation filed by Defendants State of  
16 California, Governor Brown, and Anne Gust on January 19, 2017. (Docket No. 130.)

17  
18 The Legislative Defendants hereby adopt and incorporate by reference herein  
19 the grounds and the arguments set forth in the Reply. The Legislative Defendants seek  
20 the same relief that Defendants State of California, Governor Brown, and Anne Gust  
21 seek, namely that the Court adopt the Magistrate Judge’s Report and Recommendation  
22 filed on December 15, 2016 (Docket No. 123), and dismiss the Plaintiffs’ First  
23 Amended Complaint.

24 The Legislative Defendants’ joinder in the Reply is based on this Notice of  
25 Joinder and Joinder, and the Reply to Plaintiffs’ Refusal for Fraud Directed to the  
26 Magistrate Judge’s Report and Recommendation filed by Defendants State of  
27 California, Governor Brown, and Anne Gust, the documents on file with the Court,  
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1 such other records and documents of which the Court may be requested to take  
2 judicial notice, and any oral argument to the extent the Court deems such argument  
3 necessary.  
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6 Dated: January 20, 2017

Respectfully submitted,  
DIANE F. BOYER-VINE  
Legislative Counsel

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9 By:     /s/ Cara L. Jenkins      
10 Cara L. Jenkins  
11 Deputy Legislative Counsel  
12 Attorneys for Legislative Defendants  
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CERTIFICATE OF SERVICE

Case Name: Middleton et al. v. Pan et al.

Case Number: 2:16-cv-05224-SVW-AGR

I hereby certify that on January 20, 2017, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**NOTICE OF JOINDER AND JOINDER IN REPLY TO PLAINTIFFS’ REFUSAL FOR FRAUD DIRECTED TO THE MAGISTRATE JUDGE’S REPORT AND RECOMMENDATION FILED BY DEFENDANTS STATE OF CALIFORNIA, GOVERNOR BROWN, AND ANNE GUST**

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. On January 20, 2017, I caused to be delivered the foregoing document by FedEx overnight courier to the following non-CM/ECF participants listed on the attached service list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on January 20, 2017, at Sacramento, California.

Cara L. Jenkins  
Declarant

/s/ Cara L. Jenkins  
Signature

SERVICE LIST

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Travis Middleton  
27 West Anapamu Street, No. 153  
Santa Barbara, CA 93101

Eric Durak  
133 Campo Vista Drive  
Santa Barbara, CA 93111

Jade Baxter  
207 West Victoria Street  
Santa Barbara, CA 93101

Julianna Pearce  
28780 My Way  
Oneals, CA 93645

Candyce Estave  
430 East Rose Avenue  
Santa Maria, CA 93454

Denise Michelle Derusha  
7125 Santa Ysabel, Apt. 1  
Atascadero, CA 93422

Melissa Christou  
1522 Knoll Circle Drive  
Santa Barbara, CA 93101

Andrea Lewis  
1331 Santa Barbara Street, No. 10  
Santa Barbara, CA 93101

Rachil Vincent  
4320 Viua Presada  
Santa Barbara, CA 93110

Alice Tropper  
1805 Mountain Avenue  
Santa Barbara, CA 93101

Don Demanlevesde  
618 West Ortega  
Santa Barbara, CA 93111

Jessica Haas  
2715 Verde Vista  
Santa Barbara, CA 93105

Paige Murphy  
2230 Memory Lane  
West Lake Village, CA 91361

Brent Haas  
2715 Verde Vista  
Santa Barbara, CA 93105

Lori Strantz  
120 Barranca No. B  
Santa Barbara, CA 93109

Anwanur Gielow  
390 Park Street  
Buelton, CA 93427

Lisa Ostendorf  
5459 Place Court  
Santa Barbara, CA 93111

JuliaAnne Whitney  
55 Chrestview Lane  
Montecito, CA 93108

1 Bret Nielsen  
2 2230 Memory Lane  
3 West Lake Village, CA 91361

Marina Read  
322 Pebble Beach Drive  
Goleta, CA 93117

4 Murid Rosensweet  
5 2230 Memory Lane  
6 West Lake Village, CA 91361

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