

1 JEFFREY A. WALTER, State Bar No. 63626

JWalter@chwlaw.us

2 CARMEN A. BROCK, State Bar No. 162592

CBrock@chwlaw.us

3 LILIANE M. WYCKOFF, State Bar No. 293519

LWyckoff@chwlaw.us

4 **COLANTUONO, HIGSMITH & WHATLEY, PC**

670 W. Napa Street, Suite F

5 Sonoma, California 95476

Telephone: (707) 996-9690

6 Facsimile: (707) 996-9603

7 Attorneys for Defendants

City of Novato, City Manager Adam

8 McGill, Mayor Pat Eklund, Mayor Pro

Tem Eric Lucan, Chief of Police Mathew

9 McCaffrey, Public Works Director Chris

Blunk

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 MARIN COUNTY HOMELESS
13 UNION, a local affiliate of the
14 CALIFORNIA HOMELESSNESS
15 UNION, on behalf of itself and those it
16 represents; CAMP COMPASSION, a
17 Homeless Union-affiliated encampment
18 in Lee Gerner Park; Individual Plaintiffs
19 JASON SARRIS; LEA DEANGELO;
20 ZACH BOULWARE; CARRIE
21 HEALON, LISA NICOLE JOHNSON;
22 DONALD HOBBS; DEBORAH ANN
23 MIROMONTES; LISA JOHNSON;
24 CHARLES TALBOT; BETHANY
25 ALLEN; MICHELANGELO MONTEZ;
26 DEBORAH ANN MIRAMONTES;
27 KALANI WELSCH, and other similarly
28 situated homeless persons including
current residents of Camp Compassion
homeless encampment,

Plaintiffs,

v.

CITY OF NOVATO; CITY MANAGER
ADAM MCGILL, MAYOR PAT
EKLUND, MAYOR PRO TEM ERIC
LUCAN, CHIEF OF POLICE
MATHEW MCCAFFREY, PUBLIC
WORKS DIRECTOR CHRIS BLUNK,

Defendants.

CASE NO.: 4:21-cv-05401-YGR

[Assigned to the Hon. Yvonne Gonzalez
Rogers]

**DECLARATION OF POLICE
OFFICER JOSHUA WAX IN SUPPORT
OF DEFENDANT'S OPPOSITION TO
THE ORDER TO SHOW CAUSE
REGARDING PRELIMINARY
INJUNCTION**

Hearing Date: August 9, 2021
Time: 12:00 p.m.
Ctrm: 1

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
SCN/CMA CA 05474

DECLARATION OF JOSHUA WAX

I, JOSHUA WAX, declare as follows:

1. I am a police officer in the City of Novato Police Department. I began working at the Novato Police Department ("NPD") in August of 2015 and began work as a police officer at the NPD in December of 2016. I was assigned to the Novato Response Team ("NRT") in July 2019 and have been there since. Unless otherwise stated, I have personal knowledge of the matters set forth herein and if called upon as a witness, I could competently testify thereto.

2. I make this declaration in support of Defendants' opposition to the order to show cause regarding the preliminary injunction.

Background of the Novato Response Team

3. As part of the NRT, I am one of the "Homeless Liaisons" for the Novato Police Department (as designated by the NRT Sergeant). In my duties as a Homeless Liaison, I connect with unhoused individuals across the City of Novato to provide them with assistance and services. I also work in partnership with many different organizations, social workers, behavioral health specialists, recovery coaches, and outreach workers to provide a wide variety of services to unhoused subjects in the City of Novato. Some of the resources we provide and coordinate to provide include resources for food, income, employment, mental health treatment, substance abuse treatment, and housing.

4. I conduct outreach almost daily with the unhoused community at encampments throughout the City of Novato. I conduct outreach alone, with my partner Officer Alejandro Muller, and with social services, in collaborative efforts to provide housing and other services to our unhoused community members.

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
COURT REPORTERS & VIDEO

Officer Wax's Training

5. In July of 2019, I attended a POST-certified De-escalation and Tactical Communication (ICAT) training. This training consisted of approximately 16 hours of instruction in communication, defensive tactics, and de-escalation tools.

6. In December of 2019, I attended a POST-certified Field Training Officer training. This training consisted of approximately 40 hours of instruction on training other Police Officers on how to function in their capacity as a Field Training Officer.

7. In April of 2020, I attended a POST-certified LGBT Awareness for Law Enforcement training. This training consisted of approximately four hours of instruction about LGBT community awareness.

8. In April of 2021, I attended a POST-certified Crisis Intervention Training. This training consisted of approximately 32 hours of instruction on interacting with subjects in crisis, mental health issues, substance abuse issues, and communication skills.

9. In May of 2021, I attended a POST-certified Basic Peer Support Counseling for Law Enforcement training. This training consisted of approximately 24 hours of instruction about trauma, Post Traumatic Stress, self-care, and providing support to law-enforcement peers.

10. I have attended multiple homeless-related webinars and online trainings during my career.

Overview of Outreach Efforts

11. As an Officer assigned to the NRT, I work with several organizations to provide aid (such as housing opportunities) to unhoused individuals in Novato.

12. I meet with a variety of social workers on a weekly basis to come up with action plans for unhoused individuals. I work daily with two social workers who participate in daily outreach efforts for our unhoused population. Community Action Marin/CARE Team III Social Worker Debra Walker focuses on assistance such as

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
626.792.7676

1 finding housing, job opportunities and obtaining benefits. Librado Garcia, the social
2 worker assigned to NRT on behalf of the Marin Multi-Cultural Center and Behavior
3 Health and Recovery Services, has a similar focus but is also a Case Manager and
4 Behavioral Health and Recovery Coach. Mr. Garcia's position is funded via
5 Proposition 47.

6 13. Approximately 20% of my work week is utilized to connect with social
7 service providers to provide our unhoused community with pathways to housing and
8 other solutions. Specifically, through these meetings we learn about homelessness,
9 coordinate resources for our unhoused community, and create action plans to assist
10 our unhoused community to housing solutions. We use an individualized approach. I
11 know all members of unhoused communities have different struggles, hardships, and
12 needs. Therefore, I treat each person individually and work with social workers to
13 come up with individualized plans that will suit each person.

14 14. As a team (NRT and social services), we have offered every unhoused
15 person we have contacted an opportunity to receive some sort of assistance. The
16 housing services we have offered to unhoused community members include but are
17 not limited to the Kerner Shelter, the New Beginnings Center (Homeward Bound),
18 Salvation Army programs (San Francisco, Napa, Las Vegas), faith-based organizations
19 in Santa Rosa, the Helen Vine Detoxification facility, the Center Point residential
20 treatment facility, Job Corps, various rehabilitation programs, motels, family
21 reconnections, and more.

22 15. Approximately 60% of my work week is comprised of conducting
23 outreach with our unhoused community members.

24 16. I use my legal discretion to assist the unhoused community. During my
25 hundreds of outreach efforts at Lee Gerner Park, I have witnessed dozens and dozens
26 of Novato Municipal Code violations and infractions such as littering, dogs off leash,
27 consuming alcohol in parks, smoking in parks, and more. Rather than issuing citations
28

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
COALANTUONO HIGHSMITH & WHATLEY

1 for these types of violations, I frequently used my discretion to warn unhoused
2 individuals of the violations and maintain rapport with them.

3 17. My primary outreach goal has been and continues to be to provide the
4 unhoused community with housing solutions, not citations. The citations and arrests I
5 made involving the unhoused community were conducted due to a legal or moral
6 need, or because the individual had been warned several times of the violation(s) and
7 continued to commit the violation(s).

8 18. An example of the discretion I used to better assist the unhoused
9 community involved unhoused camper and Plaintiff Jason Sarris. Plaintiff Sarris, the
10 self-proclaimed leader of the encampment at Lee Gerner Park, had an outstanding
11 bench warrant issued for his arrest due to a felony drug possession case. Plaintiff
12 Sarris had voluntarily left Lee Gerner Park and was staying at the Courtyard Marriott
13 hotel in Novato. He was planning on using the hotel stay to get back on his feet in
14 preparation to move into a housing unit in Petaluma and wanted a job. Rather than
15 booking Plaintiff Sarris into the Marin County Jail pursuant to this warrant (which
16 may have delayed his housing plan), I elected to issue Plaintiff Sarris a citation for his
17 felony warrant which is not a common practice at NPD (NP20-2169). Further, NRT
18 Officer Muller assisted with contacting the Safeway in Novato—located on Nave
19 Drive next to Sarris’ hotel—and spoke with a manager about employment for Plaintiff
20 Sarris. Plaintiff Sarris left the hotel, apparently did not follow-up with Safeway, and
21 became angry with me.

22 **Difficulties with Unhoused Campers Rejecting Assistance**

23 19. In my experience as a Homeless Liaison for the NPD, my greatest
24 difficulty has been trying to convince members of the unhoused community to accept
25 any sort of shelter option. I have “thought outside the box” by not limiting solutions to
26 shelters. The NRT has assisted unhoused subjects to reconnect with family, enter
27 mental health treatment and substance abuse treatment, seek out faith-based
28 communities, seek job programs, and more. As I am an ordained Minister, I have

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
CONVENE CA 06176

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
CALIFORNIA CA 91101

1 spoken with social workers about my willingness to facilitate the marriage of some of
2 our unhoused couples if they were interested and if it would assist them with housing
3 vouchers. It is my respectful opinion that if unhoused individual(s) is willing to accept
4 services from NRT and/or our social services partners, some sort of housing solution
5 for the unhoused individual(s) will be achieved.

6 20. Since I started with the NRT, we have used an individualized approach
7 to house members of our unhoused community. In approximately September of 2020,
8 the NRT started keeping records of the number of occupants at the Lee Gerner Park
9 encampment. Since September of 2020, approximately 70 different unhoused
10 individuals at some point occupied the Lee Gerner Park encampment. Out of those 70
11 individuals, approximately 50 individuals have left Lee Gerner Park and
12 approximately 20 remain as of July 22, 2021.

13 21. As of July 22, 2021, the Lee Gerner Park encampment had 20 known
14 occupants: Abraham Jenkins, Aimee Phillips, Calvin Franklin, Carrie Healon, Charles
15 Talbot, Chris Parra, Deborah Miramontes, an unidentified subject, Jamie Rising, Jason
16 Sarris, Kalani Welch, Lanisa Rapley, Leah DeAngelo, Michael Tierney,
17 Michaelangelo Montes, Naeema Hassan, Natalie Fleet, Steve Bealert, Zachary
18 Boulware, and Zackary Wood.

19 **Condition of the Lee Gerner Park Encampment**

20 22. Since March of 2020, I have spent nearly every day in the field
21 conducting outreach with our unhoused community. Approximately 70% of my
22 outreach in the field is conducted at Lee Gerner Park due to the number of calls for
23 service at this park.

24 23. Around March of 2020, there were only a few tents at Lee Gerner Park
25 and trash was minimal. As time went on, I noticed the condition of the park deteriorate
26 rapidly. Trash on the ground, including alcohol bottles and cigarettes, increased as
27 more tents arrived and the encampment population grew. The grass appeared ruined in
28 some areas. The land leading into the Novato Creek embankment was intentionally

1 manipulated and flattened. I observed feces throughout the park and stepped in feces
2 on numerous occasions.

3 24. Plaintiff Sarris, the self-proclaimed leader of the encampment, expressed
4 his anger and frustration toward the NRT because he felt there were not enough trash
5 cans at Lee Gerner Park. Plaintiff Sarris stated this caused him to illegally dump trash
6 in the CVS dumpster north of Lee Gerner Park.

7 25. In response to complaints about the trash cans, the NRT worked with the
8 City of Novato Department of Public Works to deploy additional trash cans at Lee
9 Gerner Park. After more trash cans were deployed throughout Lee Gerner Park, I still
10 observed and photographed excess trash throughout the grounds of the park on a
11 regular basis. Even after the Department of Public Works deployed a large dumpster at
12 the Lee Gerner Park encampment, I still observed excess trash throughout the grounds
13 of Lee Gerner Park.

14 26. To address the diminishing condition of Lee Gerner Park, the NRT met
15 with environmental impact personnel from the Marin Resource Conservation District,
16 the Marin County Stormwater Pollution Prevention Program, and Urban Forestry
17 Associates, Inc. These agencies agreed that the encampment at Lee Gerner Park had a
18 negative impact on the Novato Creek (which contains protected species).

19 **Community Concerns Relating to the Encampment**

20 27. I have communicated with several community members and business
21 owners regarding the encampment at Lee Gerner Park. I have fielded dozens and
22 dozens of complaints about the encampment causing environmental issues, negative
23 impacts to surrounding businesses, safety concerns, and fire danger. I have responded
24 to verbal altercations, physical altercations, an unlawful fire, a drug overdose, drug
25 activity, a weapon brandishing incident, and more. I have been threatened with
26 physical harm while at Lee Gerner Park and have been called numerous derogatory
27 words.
28

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
CONTRACTOR CA REG # 70727

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
CALIFORNIA CA 91101

1 28. I have also been involved in investigations around Lee Gerner Park
2 (some of which involved the encampment campers) dealing with robberies, weapons
3 possessions, weapons brandishing, and an unlawful fire. I arrested Plaintiff Sarris for a
4 warrant at Lee Gerner Park in September 2019 and recovered just under one ounce of
5 Methamphetamine in his backpack (NP19-4651).

6 29. On June 29, 2021, I was made aware of an email by Sergeant Bates. The
7 email notified me that the Novato Library (located at 1720 Novato Boulevard next to
8 the Lee Gerner Park encampment) was supposed to have a children’s summer reading
9 event on the grass area west of their building. The event was apparently cancelled by
10 Novato Library staff due to one of the unhoused campers erecting a tent where the
11 event was supposed to take place.

12 30. I have received multiple emails, telephone calls, and emails from
13 community members and business owners who have stated their quality of life, level
14 of business and income, and employee recruitment have all diminished significantly
15 since the Lee Gerner Park encampment grew. With businesses already struggling due
16 to Covid-19, business owners close to the encampment expressed additional hardships
17 to their business caused by this encampment and the campers.

18 **Covid-19 and the Encampment**

19 31. I also received or responded to dozens of concerns from the community
20 about the occupants of the Lee Gerner Park encampment not adhering to Covid-19
21 mask mandates and social distancing protocols.

22 32. During the Covid-19 Shelter-in-Place orders, some unhoused subjects at
23 Lee Gerner Park told me they needed to shelter in place at Lee Gerner Park. However,
24 their behavior with regards to following Covid-19 safety guidelines (masking and
25 social distancing mandates) was reckless. I observed the following individuals leaving
26 the encampment on a regular basis, and/or observed them not adhering to mask/social
27 distancing requirements on a regular basis:
28

1 33. I observed unhoused camper and Plaintiff Jason Sarris' social media posts
2 of him traveling to encampments in other cities during the shelter-in-place order
3 period.

4 34. Plaintiff Sarris moved from the Lee Gerner Park encampment to the
5 Novato Bachelor Officers Quarters in the Hamilton area of Novato, despite the
6 shelter-in-place order. He recruited other unhoused subjects to move to the Bachelor
7 Officers Quarters, essentially trying to convince other unhoused subjects to violate the
8 shelter-in-place order.

9 35. Plaintiff Sarris was observed going to and coming from Lee Gerner Park
10 and the Hamilton area around the time he erected a tent at the Bachelor Officer
11 Quarters in the Hamilton area of Novato. Plaintiff Sarris also mentioned to me that he
12 suffered from a skin condition. However, he frequently participated in outdoor
13 marches and protests in Petaluma, Sausalito, and Oakland during Covid-19 shelter in
14 place order periods.

15 36. Plaintiff Sarris frequently told me he did not have to leave the
16 encampment due to the shelter-in-place order. However, my observations of Plaintiff
17 Sarris contradicted this. Plaintiff Sarris moved into a new tent at the Bachelor Officer
18 Quarters around December 2020. Plaintiff Sarris appeared to frequently leave Lee
19 Gerner Park to attend protests, demonstrations, and events outside of the City of
20 Novato and the County of Marin- contradicting his apparent concern of Covid-19 and
21 the shelter-in-place order.

22 37. I observed unhoused camper and Plaintiff DeAngelo in various areas of
23 the downtown Novato district on multiple occasions during the shelter-in-place order.
24 Out of the dozens of contacts I have had with Plaintiff DeAngelo, I cannot recall her
25 wearing a mask. I observed Plaintiff DeAngelo not adhering to social distancing
26 requirements at Lee Gerner Park. I offered her housing solutions in the form of the
27 Kerner shelter and the Salvation Army programs in San Francisco and Las Vegas.
28 Furthermore, I organized an hour-long conference call with a Salvation Army Captain

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
CONTRACT # 19077

1 stationed in Napa to discuss Salvation Army programs which would best suit Plaintiff
2 DeAngelo. I also connected with a coordinator of a Salvation Army Las Vegas
3 program. The Las Vegas program specializes in assisting the LGBTQ community,
4 which Plaintiff DeAngelo had told me she was a part of. Plaintiff DeAngelo
5 completed an application for Salvation Army San Francisco but ultimately decided not
6 to enroll in these programs.

7 38. I also offered to reconnect Plaintiff DeAngelo with her family, per her
8 request. She then refused to proceed with a plan to reconnect with her family.

9 39. Plaintiff DeAngelo made unreasonable requests and demands, such as
10 demanding that the City of Novato build her a ‘cabin’ on the Novato Creek within Lee
11 Gerner Park.

12 40. I have reviewed Plaintiff DeAngelo’s Declaration and am aware that she
13 alleges her vehicle was towed. I was unable to locate any information about Plaintiff
14 DeAngelo’s vehicle being towed in NPD’s database. Furthermore, I used discretion by
15 not towing the vehicle so Plaintiff DeAngelo could have the opportunity to fix her
16 vehicle. Plaintiff DeAngelo has previously told me her vehicle was taken to a repair
17 shop, but her vehicle would not be fixed because the battery she needed to replace was
18 too expensive.

19 41. Plaintiff DeAngelo made sexual assault allegations against a parolee
20 who frequently visits Lee Gerner Park. However, investigation revealed no crime was
21 committed (NP20-2866). Plaintiff DeAngelo still returned to the Lee Gerner Park
22 encampment.

23 42. During Plaintiff DeAngelo’s time at the Lee Gerner Park encampment,
24 she was cited for littering within 150 feet of the waterway.

25 43. Plaintiff DeAngelo constantly disobeyed my demands to not smoke
26 within Lee Gerner Park because she argued it was her home.

27 44. Plaintiff DeAngelo refused services on grounds of not wanting to have a
28 Covid-19 test because it makes her sick.

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
CONCERN CA 06476

1 45. Plaintiff DeAngelo also prevented a street crew from conducting
2 construction in the 1700 block of Novato Boulevard after she armed herself with a
3 wooden paddle and sat on their construction equipment until Officer Muller and I
4 arrived on-scene.

5 46. Throughout the Covid-19 shelter-in-place order, I observed unhoused
6 campers and Plaintiffs Boulware and Healon outside of the Lee Gerner Park
7 encampment on several occasions. I observed Plaintiff Boulware skateboarding and
8 Plaintiff Healon walking down Novato Boulevard multiple times.

9 47. Plaintiff Healon had notified me of a foot injury she sustained at an
10 unknown time. She stated her foot injury made it difficult or nearly impossible to be
11 mobile. However, I consistently observed Plaintiff Healon walking in the 1600 block
12 on Novato Boulevard. I offered to call an ambulance for Plaintiff Healon on multiple
13 different occasions, but she continuously declined medical assistance in my presence.
14 On one occasion, she accepted an ambulance response but then declined medical
15 assistance upon arrival.

16 48. Although I have inferred that Plaintiff Boulware suffers from a drug
17 abuse issue due to his prior drug arrests by NPD in 2019 and 2021, he has ultimately
18 refused any housing or treatment assistance I have mentioned to him. Plaintiff
19 Boulware frequently stated he did not want to accept these services because he did not
20 want to be apart from Plaintiff Healon. However, there were multiple occasions in
21 which I contacted Plaintiff Healon while she was by herself at Lee Gerner Park.
22 Plaintiff Healon has told me on several occasions that Plaintiff Boulware was sleeping
23 at a relative's residence without her and had slept there without her for multiple days.
24 Plaintiff Healon has also cited similar reasons for not accepted housing services.

25 49. I have discussed programs with Plaintiffs Boulware and Healon such as
26 Salvation Army programs. They have ultimately declined the offers I have provided to
27 them.
28

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
626.791.1171

1 50. Plaintiffs Boulware and Healon’s tents were, in my opinion, the tents
2 with the worst conditions. They filled their tent with debris and then would fill the
3 outside surrounding areas of their tent with more debris. I frequently and consistently
4 observed cat food, spoiled food and miscellaneous trash outside of Plaintiff Boulware
5 and Healon’s tent.

6 51. Plaintiffs Boulware and Healon collected so many items that some of
7 their debris descended the embankment toward the Novato Creek. I have given them
8 several warnings about littering into the waterway due to the debris at their first tent.
9 These warnings afforded Plaintiffs Boulware and Healon several weeks to clean up
10 their tent area.

11 52. Plaintiffs Boulware and Healon’s first tent was in such messy conditions
12 that they requested a new tent from the NRT and the CARE Team and the City of
13 Novato Department of Public Works discarded their tent with their permission.

14 53. At their most recent tent, I observed that Plaintiffs Boulware and Healon
15 still had debris overflowing out of and surrounding their tent. I provided them with
16 several of the same warnings about littering into the Novato Creek, but the conditions
17 had not appeared to improve.

18 54. During various conversations with unhoused camper and Plaintiff Welch
19 throughout the Covid-19 shelter-in-place period, he stated that he had traveled to San
20 Francisco to purchase narcotics.

21 55. Plaintiff Welch frequently was visited by his child and his child’s
22 mother. These contacts would occur in an environment which did not adhere to social
23 distancing requirements.

24 56. I observed unhoused camper and Plaintiff Charles Talbot not following
25 social distancing requirements while interacting with others at the Lee Gerner Park
26 encampment.

27
28

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
C O L A N T U O N O C A H E I G H S M I T H C A W H A T L E Y

1 57. I observed unhoused camper and Plaintiff Bethany Allen not following
2 social distancing or mask requirements while interacting with others at the Lee Gerner
3 Park encampment.

4 58. During the shelter-in-place order, Plaintiff Allen admitted to visiting her
5 family who live nearby.

6
7 I declare under penalty of perjury under the laws of the State of California that
8 the foregoing is true and correct.

9
10 Executed on July 27, 2021, at Novato, California.

11
12 
13 _____
14 JOSHUA WAX

15 Colantuono, Highsmith & Whatley, PC
16 790 E. Colorado Blvd., Suite 850
17 Pasadena, CA 91101
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Marin County Homeless Union v. City of Novato, et al.

United States District Court, Northern District

Case No. 4:21-cv-05401-YGR

I, McCall L. Williams, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 790 East Colorado Boulevard, Suite 850, Pasadena, California 91101. My email address is: MWilliams@chwlaw.us. On July 27, 2021, I served the document(s) described as **DECLARATION OF POLICE OFFICER JOSHUA WAX IN SUPPORT OF DEFENDANT’S OPPOSITION TO THE ORDER TO SHOW CAUSE REGARDING PRELIMINARY INJUNCTION** on the interested parties in this action as follows:

BY ELECTRONIC TRANSMISSION: I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Northern District by using the CM/ECF system on July 27, 2021. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the USDC, Northern District CM/ECF system.

I declare that I am employed in the offices of a member of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on July 27, 2021, at Pasadena, California.

/s/McCall Williams
McCall L. Williams

Colantuono, Highsmith & Whatley, PC
790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28